

UNITED STATES DISTRICT COURT

District of Massachusetts
1 courthouse way, suite 2300
Boston, Massachusetts. 02210
617-748-9152

Rashid Jahm
Pro se
Plaintiff

Case No:05CV11638-JLT
Jury Trial Demanded

Vs

Lynch & Lynch
Stephen J. Duggan Attorney for **Defendant Craig Noland**
45 Bristol drive South Easton, MA 02375
Tel: (508) 230-2500
Defendant-Appellees.

**Plaintiff answer to defendant Craig Noland's motion of personal
Jurisdiction**

This Court has jurisdiction over this matter because plaintiff evidence and proof are undisputable against defendant Craig Noland. Personal Jurisdiction is not applicable on conspiracy against and violation of plaintiff constitutional right.

Federal Question Jurisdiction

Congress has conferred upon federal courts jurisdiction to decide federal questions i.e., cases or controversies arising under the Constitution and laws of the United States (28 U.S.C. § 1331) and cases or controversies between citizens of different states (diversity jurisdiction). (28 U.S.C. § 1332.) The existence of subject matter jurisdiction generally must be demonstrated at the outset by the party seeking to invoke it. (See FRCP 8) It cannot be conferred by consent of the parties, nor can its absence be waived. (Friedenthal § 2.2) The rule that a suit arises under the Constitution and laws of the United States only when the plaintiff's statement of his own cause of action so demonstrates is called the "well pleaded complaint rule."

1: This is a federal civil rights action pursuant to 42 U.S.C. § 1983 and § 1988, and the federal constitutional provisions and statutes referred to herein, by all the

above names mentions, as defendants are Michigan State employees and Others including defendant attorney Craig Noland (P30717), and including insurance companies together has conspire against plaintiff.

2. Plaintiff seeks compensation from Defendants in the form of special, general, consequential, and punitive damages – except as prohibited by law – including the other fees and costs reasonably incurred in the prosecution of this action.

3. The damages Plaintiff seeks from Defendants are the proximate, direct and consequential result of Defendants' willful, and/or malicious, and/or intentional, and/or reckless and/or deliberately indifferent actions and/or omissions, individually or in concert with others, which violated Plaintiffs' federal constitutional and statutory rights including – but not limited to – their conduct in:

4: Unlawfully depriving, and conspiring to deprive, Plaintiff of his well established federal constitutional and statutory rights and his rights to enjoy the due process and equal protection of law and the equal application of the law.

Now comes plaintiff who has been victimize by Michigan state judicial and plaintiff has exhaust his state level last hope when Michigan Supreme Court has fail to protect his constitutional right. Plaintiff's complaint contains several claims, all of which remain at issue. All defendants deprived plaintiff from his constitutional right. Plaintiff seeks constitutional and This Court has jurisdiction over all defendants to stop them not to deprive plaintiff from constructional right. The first is a claim under 42 U.S.C. Section 1983 in which plaintiff alleges that all conspiring parties, acting under color of state law, deprived plaintiff of his

constitutional right under equal protection of the laws under the Fourteenth amendment.

The second is a claim under 42 U.S.C. Section 1985(3) in which plaintiff alleges that all parties conspired to deprive plaintiff of his rights to due process, equal protection of the laws and of equal privileges and immunities under the laws. The third is a state law claim in which plaintiff asserts a claim of intentional infliction of emotional distress based primarily on the alleged incident of plaintiff's Oct. 31, 1999 car accident.

Plaintiff is requesting justice, due process and fair trial from this honorable court under a fair jury. Plaintiff, as and for his complaint, alleges the following upon personal knowledge as to himself and his own acts, and upon information and belief as to all other matters. Plaintiff's information and belief is based upon documented evidence.

WHEREFORE Plaintiff request discovery so plaintiff can provide more evidence.

Request to this Honorable Court for jury trial.

Dated: February 06, 2006

Rashid Jahm

Pro se

49 Hallen Ave
Lawrence, MA 01841
978-258-9419

Certificate of service

I hereby certify that a true copy of the Forgoing document was served on all known parties herein by causing a copy of the same to be mailed, postage prepaid on 2-6-06

UNITED STATES DISTRICT COURT

District of Massachusetts
1 courthouse way, suite 2300
Boston, Massachusetts. 02210
617-748-9152

Rashid Jahm
Pro se
Plaintiff

Case No:05CV11638-JLT
Jury Trial Demanded

Vs

Lynch & Lynch
Stephen J. Duggan Attorney for **Defendant Craig Noland**
45 Bristol drive South Easton, MA 02375
Tel: (508) 230-2500
Defendant-Appellees.

Plaintiff Answer, Challenge and proof that Affidavit is not all true by Craig Noland

Plaintiff's answer to No. 1

Plaintiff has all proof with evidence on **EXHIBIT (A) (B)** but Defendant did provide proof.

Plaintiff answer to No.2

This is federal Court and this court has jurisdiction on cases like defendant has conspire to violate plaintiff constitutional right and due process. Craig Noland is liable under **28 U.S.C. § 1331 and 28 U.S.C. § 1332.**

Plaintiff answers to No. 3 to 10 are Irrelevant

Plaintiff answer to No. 11 and 12 agree

Plaintiff answer to No. 13 to 31 where all fraud, conspiracy, violation of due process, violation of constitutional right, defamation, slander per se, libelous, breach of duty of care

Plaintiff answer to No. 18 is lie it was first withdrawal of plaintiff counsel first. See proof **EXHIBIT (A) Page 1, 2, 3.** Plaintiff start representing himself as pro When plaintiff find out that he being defraud.

Plaintiffs answer to No19 no true.

Plaintiff answer to No. 20 case evaluation has no date so it is not valid.

Plaintiff answer to all defendant Craig Noland no cause of action which is
Conspire statement See plaintiff Medical proof of his injuries on

EXHIBIT (C)

Plaintiff's proof of accident's pictures of the scene which are alter and tampered
By Craig Noland See **EXHIBIT (D)**

Plaintiff's answer to defendant No. 31. Plaintiff did try but when plaintiff finds
out that the system controllers are fooling him and he cannot get nowhere. His
Constitutional right has been violated and exhausts his state level. That's why
plaintiff Seek federal court.

Plaintiff is on social security see **EXHIBIT (E)** but defendant Craig Noland
own Four-law firm he create the situation and Craig Noland Financially in very
good position to defendant in federal court.

Plaintiff's Apartment building where plaintiff was renting whole apartment
complex got notice of condemnation from the city of Wyoming. See
EXHIBIT (E) page 3.

Plaintiff was acting as pro se see **EXHIBIT (A)** Page 1, 2, 3 but still Craig
Noland right letter to plaintiff Attorney see **EXHIBIT (E)** page 4 when
plaintiff call Midwest claim adjuster to remind him of offer of Craig Noland
Boat ride.

Plaintiff insert memorandum, Alter transcript of Oct. 4 2002 if any one can
make sense out of it. See **EXHIBIT (F)** Page 2 B, 3B

Court is rule by the Law not by the people. But in plaintiff case justice was rule
by the people not by the Law. I still believe Justice will be served. Because I
confident and believe on the system. And it works.

A letter of Complaint against Craig Noland was sent to attorney grievance
commission. See **EXHIBIT (F)** Page 4, 5

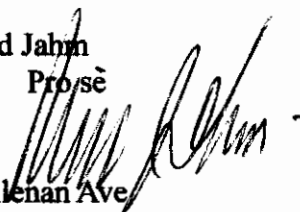
A letter From Craig Noland To Charles Vandyken sending him \$100 For
making few Copies of the record and telling him if exceed Contact him prior to
making. See **EXHIBIT (F)** Page 7

Invoice of Gary McDonald of \$1424.50 Craig Noland meeting with him and
He charged \$450. See **EXHIBIT (F)** page 6

Police Car invoice of repair due to accident \$1004 see EXHIBIT (F) Page 2, 3
WHEREFORE plaintiff Request to honorable Court for discovery and jury
trial.

Dated: February 06, 2006

Rashid Jahn
Pro/sè


49 Hallenan Ave
Lawrence, MA.01841
978-258-9419

Certificate of service

I hereby certify that a true copy of the Forgoing document
was served on all known parties herein by causing a copy
of the same to be mailed , postage prepaid on 2-6-06

Document mailed by us postal to all
Patrick Dolan
John A. Christopher
Stephen J. Duggan
Juliana deHaan rice
George L. McCarger
Mark E. Donnelly (P39281) Pro Hac Vice

SEP 18 2002

RASHID A JAHM
Plaintiff

File NO. 00-08794-NI
HON, DENNIS B. LIEBER

V
City of walker, a Michigan Municipal
Corporation, and EUGENE E KARS,
Defendants.

Craig R. Noland (p30717)
SMITH< HAUGHEY< RICE&ROEGGE
Attorneys for Defendants
200 Calder plaza Bldg.
250 Monroe N .W.
Grand Rapids ,Mi 49503-2251
616 774-8000

Rashid Jahm
3009 Eastern SE APT 303E
Grand Rapids, 49508.
(616) 559-6185

September 18, 2002

Request For retrial

Dear Hon and Respected Judge

I beg to request your Honorable judge to retrial or giving me the right to appeal of the case because of violation of my civil right and violation in standard of code of ethic by Mr. Craig Noland during his close argument and all along the trial. He even write word NO with red ink on a huge board to show and guide the jury through advising them to say what he like them to say and handing over picture to jury during cross examination and instructing jury on his opening argument telling them to write zero when you received the form of Viridic to write zero that was clearly educating to jury what he want them to do rather let them find the fact and their was not no objection by my attorney and not even he discuss about instruction of juries.

1 I hold that the police owe a duty to innocent passangers like me who are going to work and get hurt by police and police owe duty to civilian for their safety . Statutes governing operation of the emergency vehicles MCL 257 603(3)(c) Authorizes emergency vehicles to exceed prima facie speed limits, MSA 9 2332 exempts police officers from speed limits but does not exempt the police from the consequences of a reckless disregard of safety of others . MCL 257 653 . MSA 9 2353, Specifically States that the statutes dose not relieve of the driver of an authorized emergency vehicle from the duty to drive with due regard for the safety of persons using the highway. the statutory references endangering life and the safety of others demonstrate that the legislature has placed a duty upon police officer toward innocent persons.

[MCL 691.1405; MSA 3.996(105).] government agencies are liable for bodily injury and property damage resulting from the negligent operation by police officer, of a motor vehicle of which the governmental agency is owner.

That make clearly Gross negligence when Police officer E Karr testified in the witness stand that he did not apply the break and he answer that he do not know why he did not apply the break . That is question of investigation if he was in perfect and normal condition to be on job for safety of the public.

As Hon Judge Johnston write in his word That question is if officer did care when he interring the intersection but Officer Karr his own witness stand he admit he did not apply the break so that is clearly and proven gross negligence.

I request to the Hon judge to order a new trial or granting me appeal . I beg you your Hon this is matter of life of the plaintiff .

Tennessee Supreme Court in Haynes v Hamilton Co, 883 SW2d 606, 610 (Tenn, 1994), quoting Boyer v State, 323 MDA 558, 574; 594 A2d 121 (1991):

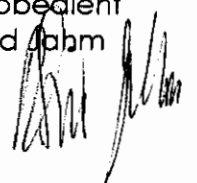
Negligent operation of a car is not limited to the negligent manipulation of the gas pedal, steering wheel, or brake pedal, such as involved in speeding, failure to pay attention to what may be in front of the vehicle, failure to apply the brakes, etc. A decision to operate or continue operating the car, when a reasonable person would not do so, clearly can be "negligent operation." For example, if one decides to operate or to continue operating a motor vehicle when he is dizzy or otherwise ill, he may be guilty of negligent operation

- 2 I press Charges Against Mr. Craig Noland For Defaming (defamation) during whole trial All I was doing is crying and no one even my attorney did not make objection every thing what he said in the whole case was not relevant to the case .
- 3 Mr. Craig Noland has been exploiting me in front of jury making racial slur and mentioning of 911 and mentioning of pakistan which was nothing to do with my injury and the accident that was irrelevant to case that was clearly slander and Libel and slander per se.
- 4 Tampering with my photo of the scene and cropping the picture the way he wanted them to look. I have been telling my attorney all along but he even did not ask me question in the trial which I wanted to explain the jury about the tampers pictures.
- 5 Bring the police chief in the uniform to harass my witness.
- 6 He has been humiliating me in the court that I am suing because I lost the business because I am poor and I am depress because I went to Pakistan I am suing because of my bad character .I trust on everybody and but he insult me and intentionally harm me .
- 7 I believe He has violated my civil right .
- 8 He has been accusing me all the time during the trial and fabricated the whole the whole situation
- 9 Misleading the jury and convencing them that I just paid \$150 to file the claim and tampering with photo. Not providing fully material to Mr. McDonald and trying to get from him what Mr. Craig wants. changing the

facts. I have been crying no one stop him that Mr. Noland what ever you saying that is not relevant to case .

- 10 Using my canceled medical authorization and offering them extra money if they accept the canceled authorization. Getting the information from Mr. George assistant of Mr. Steve. Destroying and breaching the faith of client attorney relationship
- 11 Your Hon I request to the highest court to investigate criminal investigate in the whole situation it has been conspiracy I beg to Hon judge to look in to this
- 12 This accident is the proximate cause of my disability . I have been approved by Medical expert of disability Department that is clearly show that my injury is cause by this accident of 31, oct. 1999 .
- 13 Mr. Craig noland has been failed to prove if Mr. Karr do use care when he was passing the intersection which he himself admit he did not use the break that is enough to say that he is gross negligence.
- 14 Your honor I request you for your kind justice Thank you and God Bless

Yours obedient
Rashid J. J. J.



8

IN THE CIRCUIT COURT FOR THE COUNTY OF KENT

RASHID A. JAHM,

Plaintiff,

FILE NO. 00-08794-NI

v.

HON. DENNIS B. LEIBER

CITY OF WALKER, a Michigan Municipal
Corporation and EUGENE E. KARS.

Defendants.

**RESPONSE TO PROPOSED
JUDGMENT FOR DEFENDANTS**

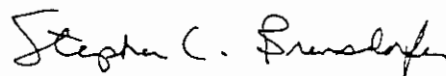
NOW COMES Bransdorfer & Russell, LLP, and in response to the proposed Judgment forwarded to this office in accordance with MCR 2.602(B)(3), states as follows:

1. The undersigned firm has served as counsel for Plaintiff, Rashid A. Jahm, during trial of the above cause.
2. A Motion for Withdrawal by this firm as counsel for Plaintiff has been filed by the undersigned firm in accordance with Rule of Professional Conduct 1.16(b)(3) and (b)(5). It is noticed for hearing on Friday, October 4, 2002 at 8:30 a.m.
3. Accordingly, in the exercise of the Court's discretionary powers as trial judge in this matter, Plaintiff or substitute counsel should be provided the opportunity to respond to the proposed Judgment.

Respectfully Submitted,

Dated: September 17, 2002

BRANSDORFER & RUSSELL, LLP



Stephen C. Bransdorfer (P11133)
Suite 411-S, Waters Building
161 Ottawa Avenue, NW
Grand Rapids, MI 49503-2898
(616) 774-8422

(2)

State of Michigan
The circuit court for county of Kent

Rastiel A. Jahm.

Plaintiff

file No 00-08794-NI

Ho. Dennis B. Lieber

city of Walker, a Michigan Municipal
Corporation and Eugene E. Kars.

Rastiel Jahm.

3009 Eastern SE Apt 303E

Grand Rapids, MI 49508

616-559-6185

Request for Retrial

Graig Noland, ROGER
Smith, Haughey, Rice,
Attorney for defendants

200 Calder Plaza Bldg

250 Monroe N.W.

Grand Rapids, MI 49503

616-574-8000

Dear Hon judge. firing of Attorney<http://www.jordans.com/images/products/KB0-03050-0-1g.jpg>

11/20/2005

due to the trust and client Attorney relation
ship. which was not properly informed me when. lot of paper and
document was changing hand between Attorney. I was not consult
and my Attorney did not ask me what I want to explain about
The picture was tamper. I was not give no chance.
and All I was doing is crying and not able to say anything
That why I fire ~~cancel~~ my Attorney. he will be not handling my
case anymore from 2-14-02.

Dear Sir

I request to Honorable court to retrial
of the case because of violation of civil Right and

poor. because of my character. That is clearly racial issues and I believe he has violated my civil right, intentional harm. Humiliation, Libel, Slander, Per se. Accusation fabrication, Misleading jury, Tampering with photos change the fact. I was crying No body stop him Not even Hon Judge. I ~~me~~ need justice, I need justice.

I request To The highest courts to investigate in The whole situation.

I has been conspiracy. I beg To The Hon Judge To look in to this.

Dear Sir
As you know defendant admit he did not put the bread. and he answer he do not know why he did not put The Bread. dear Sir That clearly is Gross Negligence of The defendant. and I ask To court To give me permission so I can give This information To Media so community be Aware of That.

Rashid John

9-14-02

(4)

4. Accordingly, defendants proceeded to file a Notice of Entry of Judgment pursuant to MCR 2.602(B)(3).

5. Plaintiff did not object to the form of the proposed Judgment, but instead, plaintiff's counsel has filed a Motion to Withdraw as Counsel.

6. Regardless of whether or not the Court approved "Plaintiff's Motion for Withdrawal as Counsel," the attached Judgment for Defendants should be entered.

WHEREFORE, defendants request that the Court enter the attached Judgment for Defendants.

DATED: September 19, 2002

SMITH HAUGHEY RICE & ROEGGE

By: C. R. Noland
Craig R. Noland (P30717)

Attorneys for Defendants

BUSINESS ADDRESS:

200 Calder Plaza Building
Grand Rapids, MI 49503
(616) 774-8000

5

I. INTRODUCTION

Plaintiff filed a document entitled "Response of Plaintiff Motion Opposing Defendants Proposed Judgment" dated September 22, 2002. Plaintiff also filed a "Notice of Hearing" for Friday, [REDACTED].

Defendants file this Brief in response and opposition to plaintiff's Motion.

Plaintiff filed a Claim of Appeal on October 23, 2002. Thus, this Court lacks jurisdiction to set aside or amend the Judgment in Favor of Defendants entered on October 4, 2002. MCR 7.208.

The balance of this Brief is presented to the extent this Court finds that plaintiff's present Motion falls outside the limitations set forth in MCR 7.208(A).¹

II. LIST OF ATTACHMENTS

The following documents are attached to this Brief:

1. Plaintiff's Claim of Appeal dated October 23, 2002.
2. Trial testimony of Dennis Michael Payne (cross-examination).
3. Trial testimony of Eugene Kars.
4. Trial testimony of Dr. Fox.
5. Excerpt from plaintiff's Trial Exhibit 23.

¹ RULE 7.208 AUTHORITY OF COURT OR TRIBUNAL APPEALED FROM

(A) Limitations. After a claim of appeal is filed or leave to appeal is granted, the trial court or tribunal may not set aside or amend the judgment or order appealed from except by order of the Court of Appeals, by stipulation of the parties, or as otherwise provided by law....

STATE OF MICHIGAN
THE CIRCUIT COURT FOR THE COUNTY OF KENT

RASHID A. JAHM,

Plaintiff,

File No. 00-08794-NI

v

HON. DENNIS B. LEIBER

CITY OF WALKER, a Michigan Municipal
Corporation, and EUGENE E. KARS,

Defendants.

Stephen C. Bransdorfer (P11133)
David C. Bransdorfer (P49814)
George L. McCargar, III (P45588)
BRANSDORFER & BRANSDORFER, P.C.
Attorneys for Plaintiff
161 Ottawa Ave., N.W. - Ste 411-S
Grand Rapids, MI 49503-2898
(616) 774-8422

Craig R. Noland (P30717)
SMITH, HAUGHEY, RICE & ROEGGE
Attorneys for Defendants
200 Calder Plaza Bldg.
250 Monroe N.W.
Grand Rapids, MI 49503-2251
(616) 774-8000

NOTICE OF ENTRY OF JUDGMENT

PLEASE TAKE NOTICE that the attached Judgment is being submitted pursuant to MCR 2.602(B)(3) and, if no written objections are filed thereto with the Clerk of the Court within seven (7) days of the filing of said proposed Order, same shall be submitted to Judge Lieber for entry with the court record.

DATED: September 16, 2002

SMITH, HAUGHEY, RICE & ROEGGE

By: Craig R. Noland
Craig R. Noland (P30717)
Attorney for Defendants
BUSINESS ADDRESS:
200 Calder Plaza Building
Grand Rapids, MI 49503
(616) 774-8000

SMITH HAUGHEY RICE & ROEGGE

A Professional Corporation
ATTORNEYS AT LAW

200 Calder Plaza Building
250 Monroe Avenue, N.W.
Grand Rapids, Michigan 49503-2251
Telephone 616-774-8000
Fax 616-774-2461

1400 Abbott Road, Ste. 410
East Lansing, Michigan 48823-1902

202 E. State Street, Ste. 100
Traverse City, Michigan 49684

320 N. Main Street, Ste. 101
Ann Arbor, Michigan 48104-1127

<http://www.shrr.com>

Robert M. Kruse
Jeffrey R. Wonacott
Aileen M. Leipprandt
David J. DeGraw
Robert W. Parker
Paul T. Jarboe
Jeffrey E. Gwillim
Randall L. Velzen
John R. Oostema
Matthew L. Meyer
Martha P. Forman
Todd W. Millar
Veronica A. Marsich
Karl W. Butterer, Jr.
Garrett J. TenHave-Chapman
Peter J. Boyles
Thomas R. TerMaat
Jane C. Hofmeyer
William A. Sikkell, IV
Rachel Brochert Roe

Jo Beth Earl
Angela T. Ross
Eric W. Phelps
Kevin M. Lesperance
Heather R. Blanton
Timothy D. VandenBerg
Jeffrey J. Noorman
William L. Henn
Kirk W. Morgan
Mark A. Gilchrist
Brian A. Molde

Also licensed in:
1 Colorado
2 District of Columbia
3 Florida
4 Illinois
5 Indiana
6 Pennsylvania
7 Wisconsin
8 Georgia

L. Roland Roegge
Thomas F. Blackwell
P. Laurence Mulvihill
Thomas R. Tasker
Lance R. Mather
Charles F. Behler
Gary A. Rowe
Edward R. Stein
William W. Jack, Jr.
William J. Hondorp
Thomas M. Weibel
James G. Black
E. Thomas McCarthy, Jr.
Glenn W. House, Jr.
Craig R. Noland
Paul M. Oleniczak
Craig S. Neckers
George F. Bearup
John C. O'Loughlin
Anthony J. Quarto

John M. Kruse
Paul Van Costenburch
Mark P. Bickel
William R. Jewell
Jon D. Vander Ploeg
Patrick F. Geary
R. Jay Hardin
Terence J. Ackert
Brian J. Kilbane
Charles B. Judson
Robert C. Stone
Robert W. Tubbs
Douglas G. Powe
Richard C. Kraus
Albert J. Engel, III
Phillip K. Mowers
Carol D. Carlson
Marilyn S. Nickell Tyree
Christopher R. Genthner
Beth S. Kromer

A. B. Smith, Jr.
David O. Haughey
Lawrence P. Mulligan
Albert T. Quick
Brenda Jones Quick
Of Counsel

Robert V. V. Rice
1899-1982

Laurence D. Smith
1913-1980

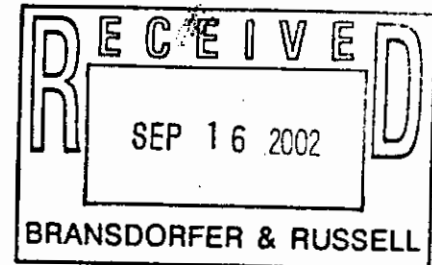
Michael S. Barnes
1944-1989

September 16, 2002

Writer's Direct Dial Number
(616) 458-9466

Circuit Court Clerk
Kent County Circuit
180 Ottawa N.W.
Grand Rapids, MI 49503

Re: Jahm v City of Walker, et al
Case No. 00-08794-NI
Our File No. 70483



Dear Clerk:

Pursuant to MCR 2.602(B)(3), enclosed please find our proposed Judgment which is to be signed by Judge Lieber if none of the parties hereto file written objections with your office within seven (7) days of the date of this correspondence.

We also enclose herein a notice to all parties that the Order will be signed and entered into the record unless objected to in accordance with the above-mentioned court rule.

After same has been entered, kindly render the enclosed copies true and forward them to us in the return envelope for distribution to counsel.

Very truly yours,

SMITH HAUGHEY RICE & ROEGGE

Craig R. Noland

CRN:slo
cc w/encls: George L. McCargar, III
Hon. Dennis B. Lieber

BRANS DORFER & RUSSELL

SEP 8 2002
Kent County Clerk

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF KENT

RASHID A. JAHM,

Plaintiff,

FILE NO. 00-08794-NI

V.

HON. DENNIS B. LIEBER

CITY OF WALKER, A Michigan Municipal
Corporation and EUGENE E. KARS.

Defendants.

RASHID A. JAHM
3009 EASTERN SE APT 303E
GRAND RAPIDS MI, 49508
(616) 559-6185

SMITH HAUGHEY, RICE & ROEGGE
Craig R. Noland (P30717)
Attorneys for Defendants
200 Calder Plaza Building
250 Monroe, NW
Grand Rapids, MI 49503-2251
(616) 774-8000

NOTICE OF HEARING

Please take notice that Plaintiff's Motion and Objection opposing defendants' proposed judgment shall be brought on for hearing before the Honorable Dennis B. Leiber in the Kent County Circuit Court, 180 Ottawa Ave. N.W., Grand Rapids, Michigan, 49503, on Friday, November 1, 2002 at 1:30 p.m.

Dated: September 23, 2003

By Plaintiff,

Rashid Jahm
3009 Eastern SE Apt 303E
Grand Rapids, MI 49508
(616) 559-6185

IN THE CIRCUIT COURT FOR THE COUNTY OF KENT

RASHID A. JAHM,

Plaintiff,

FILE NO. 00-08794-NI

V.

HON. DENNIS B. LIEBER

CITY OF WALKER, A Michigan Municipal
Corporation and EUGENE E. KARS.

Defendants.

RASHID A. JAHM
3009 EASTERN SE APT 303E
GRAND RAPIDS MI, 49508
(616) 559-6185

SMITH HSUCHEY, RICE & ROEGGE
Craig R. Noland (P30717)
Attorneys for Defendants
200 Calder Plaza Building
250 Monroe, NW
Grand Rapids, MI 49503-2251
(616) 774-8000

**RESPONSE OF PLAINTIFF MOTION OPPOSING DEFENDANTS'
PROPOSED JUDGEMENT**

NOW COMES Plaintiff Rashid A. Jahm this letter is a written objection within the seven (7) days of the received correspondence, pursuant to MCR 2.602 (B)(3) the proposed Judgement dated September 16, 2002.

- 1. Due to Mr. Craig Noland's false statements, Slander, Libel and Malice that clearly show the racial state of his mind towards the plaintiff, these tactics were used to exploit and influence the jury to reach a seriously erroneous result of straight NO which require a new trial or file in the court of appeal in the interest of justice. A request of investigation of the whole trial including tampering of the pictures of the accident and admission of Mr. Kars not applying the brakes and not knowing the reason why he did not apply the brakes. That is question of investigation.**
- 2. MCR 2.611 New Trial Amendments of Judgement –**
Based on the evidence and testimonials presented during the trial, the jury clearly went against the greater weight of evidence of the Plaintiff. This was due to Mr. Craig Noland continually misleading the jury by presenting irrelevant and erroneous facts, mentioning my divorce and advising the jury that I did not get approved for disability, which was another false statement on his behalf. The intentional misrepresentation of my character, by continually belittling me and describing me as a greedy man. He even went so low as to use the tragedy of 9/11, to mention my visit to see my family in Pakistan.
- 3. MCR 2.115 under this rule pleading was false and vague, MR. Craig Noland's insulting Language was a defamation of the Plaintiff's character, he even mentioned to the jury, that he was 'boring them all by picking on him' (the plaintiff).**
- 4. Harassing my witnesses by bringing the police chief in the uniform which was a another tactics that he uses to accomplish his mission.**

Case 1:05-cv-00021 Document 32-3 Filed 02/07/2006 Page 10 of 11
I request the court to provide the previous cases that Mr. Craig Noland has defended as they may have been denied a fair trial based on his courtroom tactics and ethics. Therefore, the Plaintiff respectfully requests that this court enter the order to bar any requests from the defendant's party until this investigation is completed.

Dated: September 22, 2002

By:

**Rashid A. Jahm
3009 Eastern SE Apt 303E
Grand Rapids, MI 49508
(616) 559-6185**

04/24/2003 11:14:26
R5926

Docket Sheet

Page: ~~11~~ *11*

Detail

Dr

00-08794-NI JAHM, RASHID A vs. MICHIGAN STATE POLICE et al

No.	Date of Filing	Operator	Pleadings and Actions	Original Amt Due/ Amt Dismissed	Balance Due
			Journal Book-Page-Nbr Ref Nbr		
111	09/06/02	cnvKCVdk t00	Partial transcript of trial filed. (Pages= 43, condensed) (heard on <u>8/28/02</u>) (Shawn M. Breimayer)	0.00	0.00
112	09/09/02	cnvKCVdk t00	Verdict Form filed. <i>change which is correct?</i>	0.00	0.00
113	09/09/02	cnvKCVdk t00	Record of jury trial filed. (11th day, September 9, 2002)	0.00	0.00
114	09/16/02	cnvKCVdk t00	Notice of submission of order pursuant to MCR 2.602(B)(3) and proof of service filed.	0.00	0.00
115	09/17/02	cnvKCVdk t00	Response to proposed judgment for defendants and proof of service filed. by Stephen C. Bransdorfer on behalf of Rashid A. Jahm	0.00	0.00
116	09/17/02	cnvKCVdk t00	Motion for withdrawal as counsel for plaintiff Rashid A. Jahm, notice of hearing & proof of service filed. mt fee pd. (set for 10/4/02 @ 8:30 a.m.)	0.00	0.00
117	09/18/02	cnvKCVdk t00	Request for retrial filed. ✓	0.00	0.00
118	09/20/02	cnvKCVdk t00	Motion for entry of judgment, notice of hearing, brief & proof of service filed. mt fee pd. (set for 10/4/02 @ 8:30 a.m.)	0.00	0.00
119	09/23/02	cnvKCVdk t00	Notice of hearing on plaintiff's motion and objection opposing defendants' proposed judgment filed. (set for 11/1/02 @ 1:30 p.m.)	0.00	0.00
120	09/23/02	cnvKCVdk t00	Objection, response of plaintiff motion opposing defendant's proposed judgement filed. by Rashid A. Jahm	0.00	0.00
121	10/04/02	cnvKCVdk t00	Proof of Service filed. (Order Authorizing Withdrawal of Counsel for Plaintiff Rashid A. Jahm)	0.00	0.00
122	10/04/02	cnvKCVdk	Order withdrawing counsel filed. for Jahm whose	0.00	0.00

February 19, 2002

Linda Bradley, Claims Specialist
State Farm Insurance Company
PO Box 9209
95 Gezon Parkway
Wyoming MI 49509

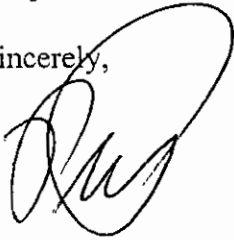
Dear Linda:

I am responding to your January 24th letter in regard to Jahm Rashid.

As described in my letter, I diagnosed him as having depressive disorder, not otherwise specified, and a cognitive disorder, not otherwise specified. They are diffuse problems with logical thinking, decision-making, and action. The timing of the onset of these symptoms is congruent with the accident he had in October 1999. I have not been able to identify any other explanation for the symptoms. Hence I would consider them to be the results of the October 31st 1999 motor vehicle accident.

I hope this information is helpful.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Fox", with a large, looping flourish at the end.

Philip S Fox MD

D021902
T022202cbh

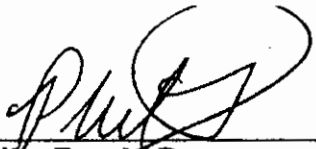
AFFIDAVIT OF PHILLIP FOX, M.D.

PHILLIP FOX, M.D., being duly sworn, says as follows:

1. He is a licensed allopathic physician with offices located at 300 - 68th Street, S.E., Grand Rapids, Michigan.
2. He is a psychiatrist whose practice includes regular diagnosis and treatment of patients with closed head injuries.
3. Rashid Jahm is a patient of the undersigned and has received ongoing treatment from the undersigned.
4. Rashid Jahm last received treatment as a patient of the undersigned on Tuesday, February 5, 2002.
5. Based on my examinations and treatment, it is my conclusion at this time that Rashid Jahm suffered a serious neurological injury as a result of the automobile collision on October 31, 1999.

X 8

Dated: February 7, 2002


Philip Fox, M.D.

Subscribed and sworn to before me this 7th
day of February, 2002.

Sandra J. Rickert
Notary Public
County of Kent
State of Michigan
My Commission Expires: 12-20-2006



325 East Eisenhower Parkway
Second Level
Ann Arbor, MI 48108-0744

Patient Services: 734-998-6644
888-254-BACK

General Business: 734-615-1750
Fax: 734-615-1770

website: www.med.umich.edu/pmr/spine
email: spine_program@umich.edu

Andrew J. Haig, MD
Medical Director
January 30, 2000

To: Amy Waters
Circuit City Stores inc
Personnel/Disability
Fax 804-527-4068

Re: Rashed Jahm
Our patient number 30779204

Dear Ms. Waters,

I spoke to Karen McKittrick of your office today regarding Mr. Jahm, a Michigan employee who is in your caseload. Mr. Jahm has given me permission to discuss medical and social details of his case with Circuit City.

Basically, this gentleman was involved in a motor vehicle accident, with subsequent head injury (perhaps mild deficits), neck pain (with objectively documented nerve damage) and clinical depression. We've just gotten to the point where we have a specific plan for a multidisciplinary rehabilitation program to assist him in his recovery. The prognosis for this man, is quite good for return to full duties, especially given his past history which reflects intelligence and hard work.

Mr. Jahm is quite concerned about his performance in the past at work. He describes mental lapses and physical difficulties, for example. He fears that if he is not put on short term disability he will be terminated for poor performance.

I could put him on short term disability, and will do so if the company sees him as about to be terminated. But the best thing for Mr. Jahm (as well as for your disability payment system, I hope) is to have him continue his duties when not in therapy. Ms. McKittrick was quite supportive of his continued employment during this rehabilitation period. She assured me that the company has a partial duty policy and the company will try to communicate with me should he be at risk for termination.

By this letter, I restrict him from some activities-he cannot lift over 20 lb, cannot perform highly repetitive overhead lifting. He should not be involved in mathematical or financial calculations beyond the running of his cash register. He should not be placed in highly stressful social situations without some back-up from other employees. Finally, he will need time to commute to Ann Arbor for participation in a multidisciplinary rehabilitation



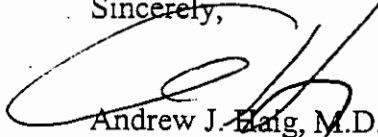
(5)

Jahm p. 2

approach, the "Pain Management Program" here at The Spine Program. The exact dates and times are not yet established, but therapy will be a few times a week for about two months. I anticipate that these restrictions will be substantially decreased or eliminated after rehabilitation.

Thank you and Circuit City for supporting his rehabilitation. Feel free to communicate any issues with me via my academic office number at 734-615-1750 x 221.

Sincerely,



Andrew J. Haig, M.D.

Associate Professor, Physical Medicine and Rehabilitation and Surgery
Director, the Spine Program
The University of Michigan



NEUROSCIENCE DEPARTMENT

PATIENT NAME	MEDICAL RECORD #	DATE	
JAHM, RASHID A	000501657	12/07/2000	
PROCEDURE	SEX/AGE	DOB	PT TYPE
EMG AND NCT STUDIES	M/49	06/25/1951	OP
PHYSICIAN(S)			
Ordering: Farook J Kidwai, MD Interpreting: Michael W Grof, DO Steve L Lasater, MD			

REASON FOR REFERRAL:

Rule out cervical radiculopathy on the left.

CLINICAL SUMMARY:

Nerve conduction studies were performed in left upper limb. All sensory and motor nerves tested demonstrated normal distal latencies, amplitudes and conduction velocities. The patient complains of numbness in the ulnar distribution, but the ulnar nerve tested normal in all segments. The ulnar F wave was normal.

An EMG needle study of selected muscles in left upper limb demonstrates a few scattered positive sharp waves and fasciculations in muscles heavily innervated by C7 and C8. There is slight reduced motor unit recruitment in C7 innervated muscles.

CLINICAL INTERPRETATION:

Mildly abnormal EMG. There is evidence of mild irritability of the motor units of C7 and C8. There is no evidence of any significant recent denervation. I find no evidence of brachial plexopathy or entrapment neuropathy.

Per dictation. Signed report on file
Michael W Grof, DO

MWG:12/07/2000
kkd:12/08/2000 5:00 P
Doc # 105924

**NEUROSCIENCE DEPARTMENT**

PATIENT NAME	MEDICAL RECORD #	DATE
JAHM, RASHID A	000501657	02/07/2002
PROCEDURE	SEX/AGE	DOB
EMG AND NCT STUDIES	M/50	06/25/1951
PT TYPE		OP
PHYSICIAN(S)		
Ordering: Johnathan G Meier, DO Interpreting: Michael W Grof, DO		

REASON FOR REFERRAL:

Rule out lumbosacral radiculopathy on the left.

CLINICAL SUMMARY:

Nerve conduction studies were performed in left lower limb. All sensory and motor nerves tested normal for distal latencies, amplitudes, and conduction velocities with the exception of the tibial motor amplitude, which is abnormally low. The H wave reflex is also mildly prolonged for this leg length.

EMG needle study of selected muscles in left lower limb, demonstrates mild abnormal insertional activity in S1 innervated muscles. However, motor unit recruitment appeared to be normal.

CLINICAL INTERPRETATION:

Mildly abnormal EMG. There is evidence of a very slight S1 radiculopathy on the left without evidence of any significant recent denervation.

A handwritten signature in black ink that reads "Michael W. Grof, D.O.".

Per dictation. Signed report on file.

Michael W Grof, DO

MWG:02/07/2002
bje:02/07/2002 2:01 P
Doc # 213514



METROPOLITAN
HOSPITAL

REGIONAL PAIN MANAGEMENT CENTER
(616) 252-7131

PROGRESS NOTE

Name: Rashid Jahm

Doctor: Keith Javery, D.O.

Date: October 20, 2000

Page: 1 of 1

Mr. Jahm reports back to the Metropolitan Hospital Pain Management Center after his second visit and his first invasive treatment for his post motor vehicle accident cervicalgia.

While he did note some pain relief with this, he is still having significant cervicalgia despite my best efforts so far and there does seem to be a bit of muscular spasm still going on, but otherwise he is unchanged from his first two visits.

I therefore held off from invasive therapy since, first of all he doesn't have a driver as previously instructed and second of all, he didn't get that much pain relief and I therefore started him Vioxx, 25 mg a day and Zanaflex, a useful muscle relaxant for the chronic pain patient at 4 mg up to twice a day. I warned him specifically against operating heavy machinery and driving while he is taking Zanaflex. I will see him back in about six weeks to check his progress, but I told him to continue his conservative therapy.

Keith Javery, D.O.

T: 10-24-00/sc

MICHIGAN PAIN CONSULTANTS, PC

PAIN MANAGEMENT CENTER

4100 Lake Drive, SE • Suite 300
Grand Rapids, MI 49546Phone: 616.285.1377
Fax: 616.285.1000

January 29, 2002

Rashid Jahm (39059)

Page: 1 of 1

Mr. Jahm reports back to the Michigan Pain Consultants Pain Management Center after seeing him a few months ago for his chronic left-sided cervicalgia, which is bothering him as a direct result of his motor vehicle accident.

His signs and symptoms today are still consistent with referred facet pain; and with inducement of non-neutral mechanics on his neck, I was able to exactly reproduce his neck pain and indeed involuntary muscular spasm was noted through the splenius cervicis, splenius capitis and some of the scalene muscles as well on the left side only.

We did repeat the fluoroscopically guided zygapophyseal joint injection therapy since this does continue to give him good relief.

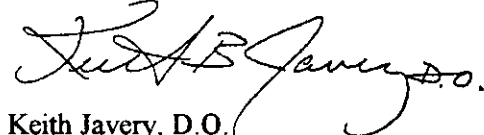
We therefore brought him to the fluoroscopy suite where he was placed in supine position on the fluoroscopy table.

After sterile prep and drape of the left side of his neck, the intraarticular portions of the zygapophyseal joints at C2-3, C3-4, C4-5, C5-6, C6-7 and C7-T1 on the left side only were entered with the 25-gauge 2-inch spinal needles.

After these joints were entered, a total dose of 5 mg of triamcinolone and 1 cc of 1% lidocaine were administered to each of those multiple joints. He tolerated the procedure well with no complications noted.

I have asked Mr. Jahm to see me back in the next few months if needed.

Mr. Jahm has also asked me if his pain is a direct result of his motor vehicle accident, and it is my medical opinion that indeed it is.



Keith Javery, D.O.
T: 01-30-02/slk

Ab.
Att. Linden



DOCTORS CHIROPRACTIC

www.bestchirodocs.com

Specializing in Computerized Analysis and Treatment

11827 East Fulton Lowell, MI 49331



Dr. Paul Tuthill
paultdc@iserv.net

Phone (616) 897-4999 Fax (616) 897-1133

Dr. Anthony Trombly
doctrombly@yahoo.com

Mr. Stephen Bransdorfer
Attorney at Law
125 Ottawa Avenue
Grand Rapids, MI 49503

FILE

Report on: Rashid Jahm

Dear Mr. Bransdorfer,

The above captioned patient first entered this office on February 14, 2000 for examination and treatment of injuries sustained in an automobile accident which occurred on October 21, 1999.

CHIEF SYMPTOMS

1. The patient has severe headaches at the base of his skull that started immediately after the impact.
2. The patient stated he felt gradual onset of neck pain and mid back pain within hours of the accident.
3. The patient states he cannot bend or turn his neck in any direction without severe pain.
4. The patient has shooting pains from his neck into his left arm.
5. The patient described shooting pain from his neck to mid scapula region.
6. Pain in the upper thoracic region.
7. Pain under the left scapula.
8. Pain in lumbar region.

PAST HISTORY - NONCONTRIBUTORY EXAMINATION

The usual orthopedic, neurological and chiropractic tests were performed on this patient. Palpable cervical muscle spasms, palpable edema in the cervical region and incomplete range of motion through the cervical spine were present.

X-RAY EXMANINATION

The usual x-ray studies were taken of this patient which aided me in determining his diagnosis which is described in the following.

Page 2
RE: Rashid Jahm

DIAGNOSIS

The patient has sustained:

1. Acute traumatic severe sprain/strains to the cervical spine complicated by:
 - A) hypolordosis
 - B) multiple levels of Vertebral Intersegmental Dysfunction
2. Acute traumatic severe sprain/strain to the thoracic spine complicated by multiple levels of Vertebral Intersegmental Dysfunction
3. These spasms are accompanied by ligamentous instability, myofasitis, and localized evidence of nerve root irritation.
4. Left brachial neuralgia.
5. Acute traumatic moderate lumbar sprain/strain.
6. Acute traumatic moderate sacroiliac sprain/strain.

These injuries are of permanent nature.

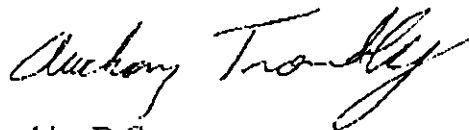
PROGNOSIS

Due to the extreme structural weakness of the cervical and thoracic spine, traumatically induced, and the neurological deficits manifested, it is apparent that the patient's symptoms are going to be recurrent. He can expect intermittent exacerbation's of pain and stiffness in the cervical and upper thoracic region, left arm pain, and headaches.

I feel that this patient has sustained permanent partial spinal impairment at 15% of the body as a whole. In view of this and to protect his future health, I plan to maintain Mr. Jahm under treatment and observation for a minimum of 90 days on a continued reduction of frequency basis.

If I can be of further assistance to you regarding this case, please feel free to contact me.

Sincerely,



Anthony Trombly, D.C.

KEVIN FLOOD, D.D.S.

4990 CASCADE ROAD SE
GRAND RAPIDS MI 49546

616-974-4990
FAX 616-974-4999



June 18, 2001

State Farm Insurance Companies
Attn: Alice McMillian
PO Box 9209
Wyoming, MI. 49509-0209

RE: Rashid Jahm
Claim Number: 22-V209-200
Date of Loss: 10-31-99
Account number: 41301
Date of Birth: 6-25-51

Dear Ms. McMillian,

Mr. Jahm was seen at this office on 3-15-01. His chief complaint at this visit was pain in his jaw joints. The following symptoms were noted: jaws feeling tired after eating; jaws ache when opening wide; noises in both jaw joints; and locking closed on several occasions.

The following signs were noted at the examination: clicking bilaterally in the temporomandibular joints; maximum opening without pain of 25 mm.; and a maximum opening with pain of 39 mm.

Mr. Jahm states his involvement on a motor vehicle accident on 10-31-99 as the start of his jaw symptoms. I have examined medical records from Dr. Nezwiek, Dr. Byron Scott, Dr. Wildern, Dr. Cilla, Dr. Trombley, and Dr. De Leeuw. I have also examined the police accident report.

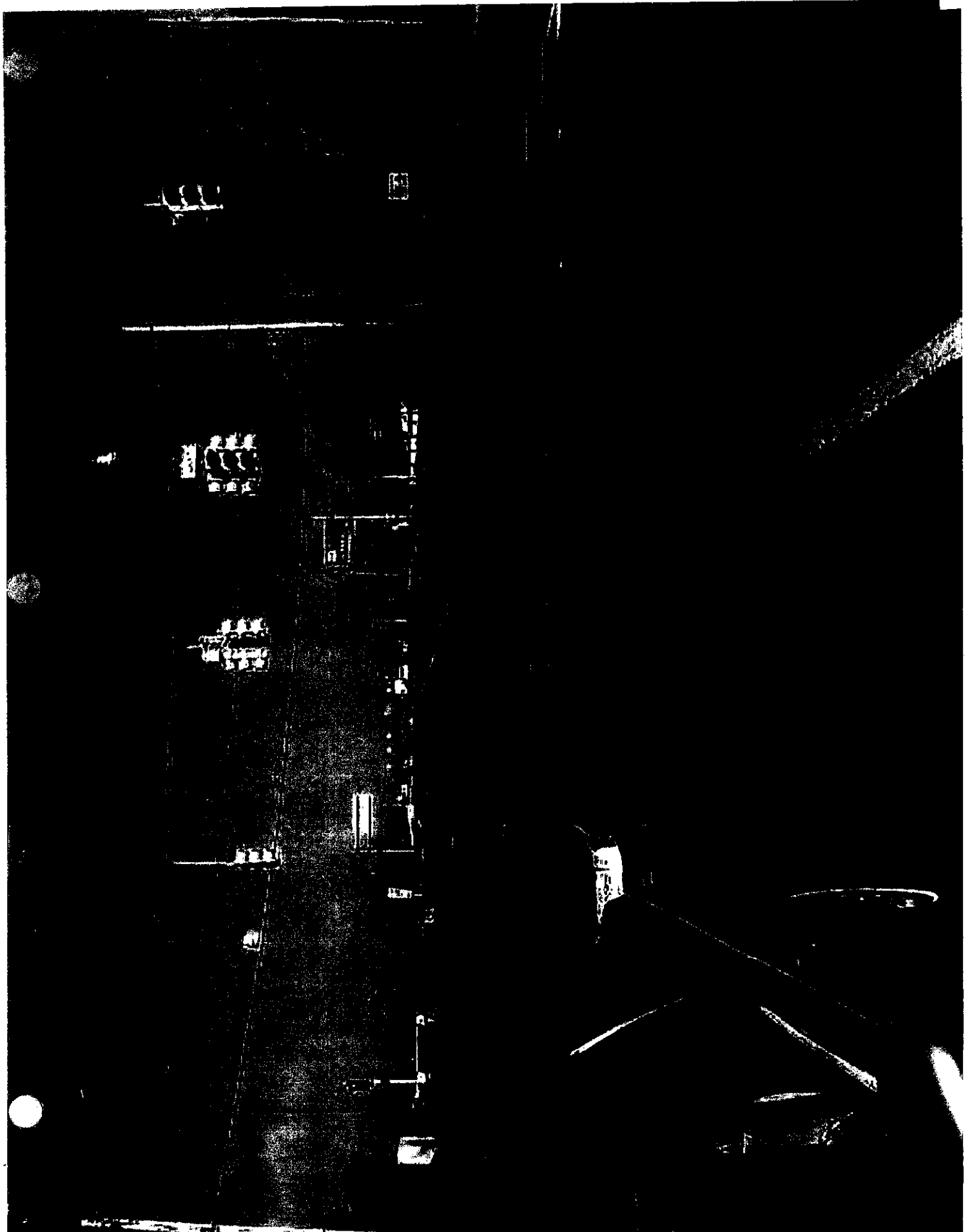
I am enclosing previous dental records for Mr. Jahm from Richard Nezwiek dated 8-18-98. These records are approximately 1 year prior to the motor vehicle accident. There is no mention of "TMJ Dysfunction" mentioned by Dr. Nezwiek.

It is my opinion that the motor vehicle accident of 10-31-99 caused the temporomandibular joint dysfunction that Mr. Jahm is presently experiencing.

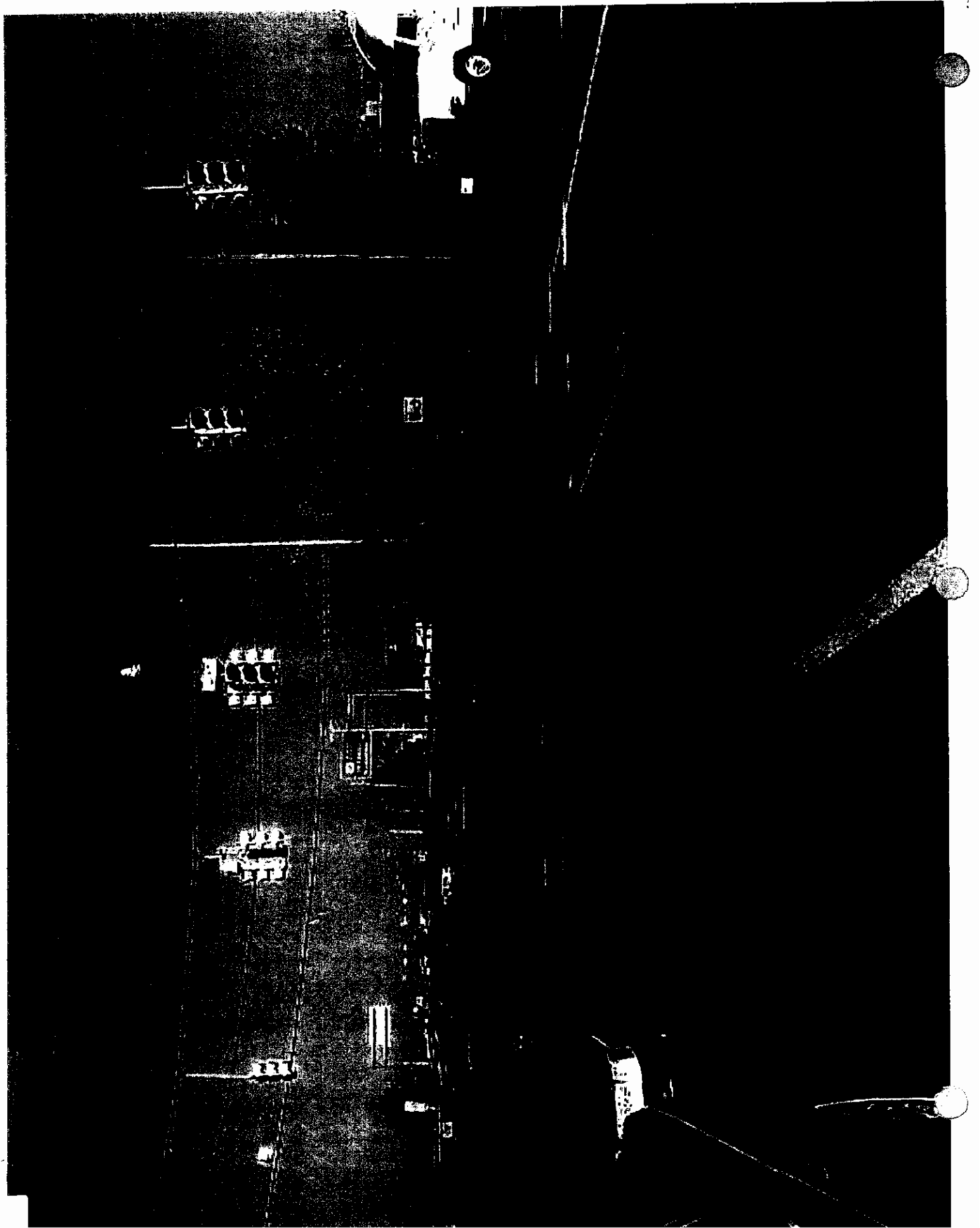
I am requesting diagnostic records. I am waiting for your approval before any diagnostic records are taken. This request for diagnostic records will also include a narrative after I have had time to evaluate the records.

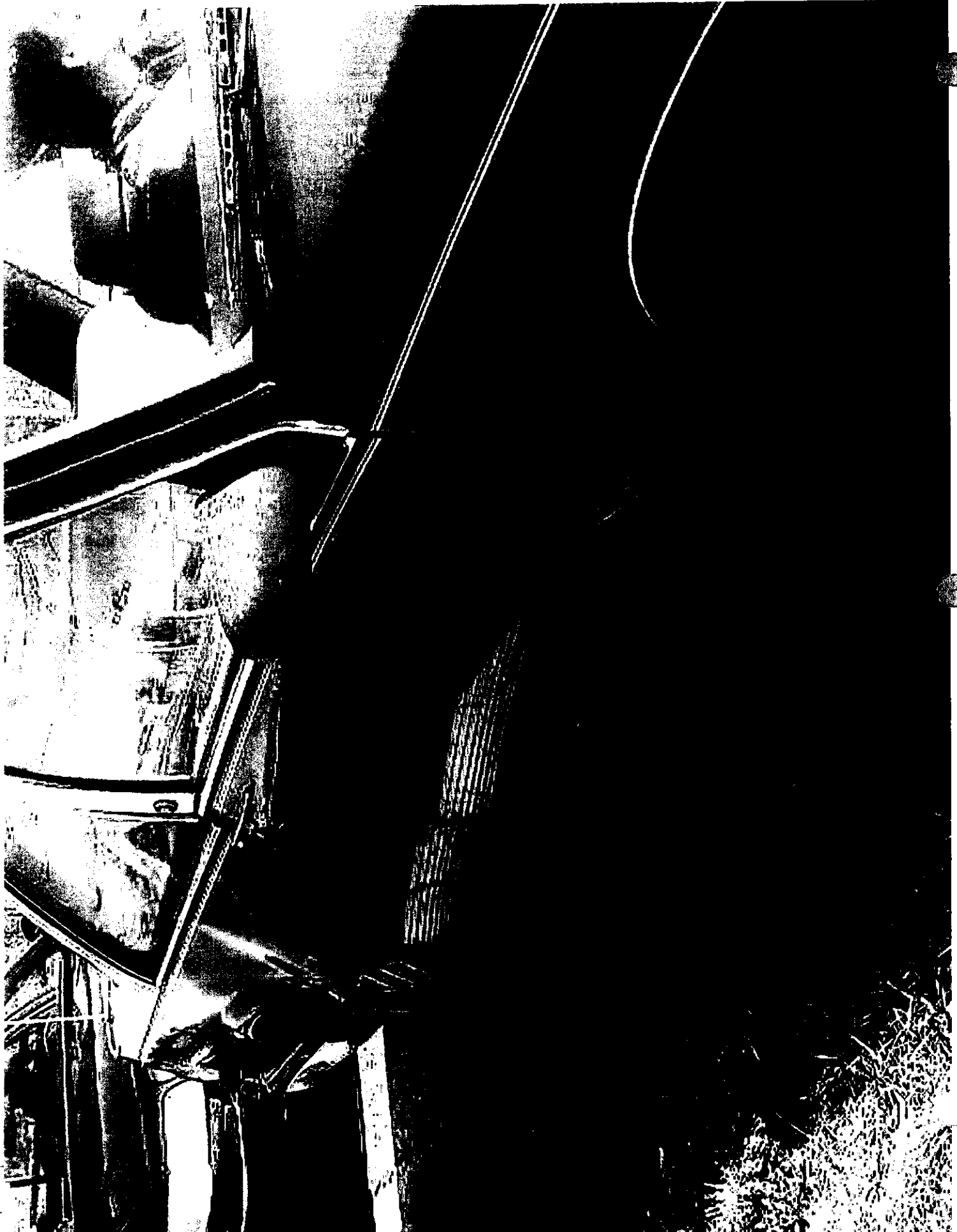
Please call if you have any questions. I am also including all the dental records I have had an opportunity to examine. Only the records of Dr. Nezwiek pre-date the motor vehicle accident. Dr. Nezwiek's records consist of two pages dated August 18, 1998.

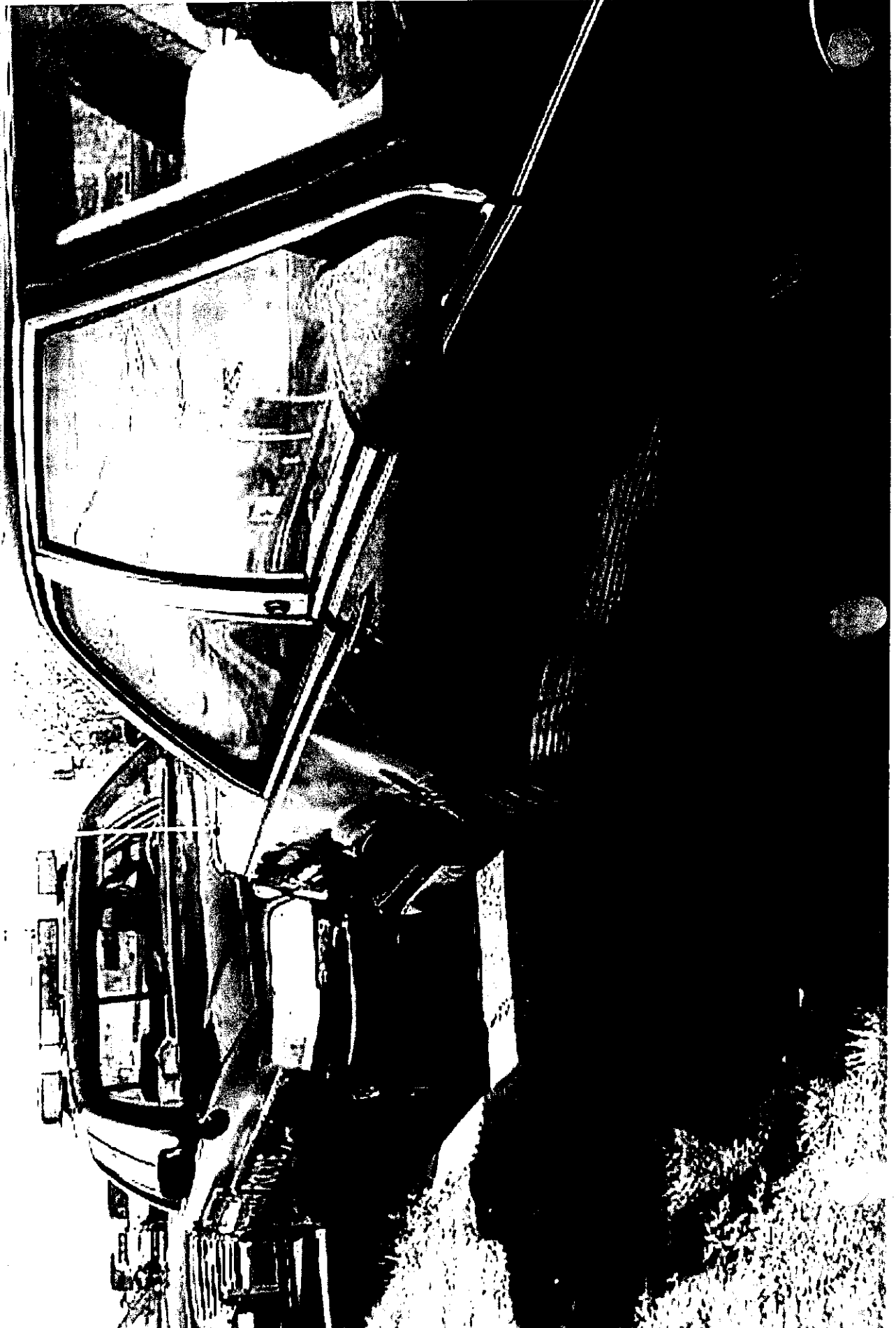
A Different Kind of Dentist



2







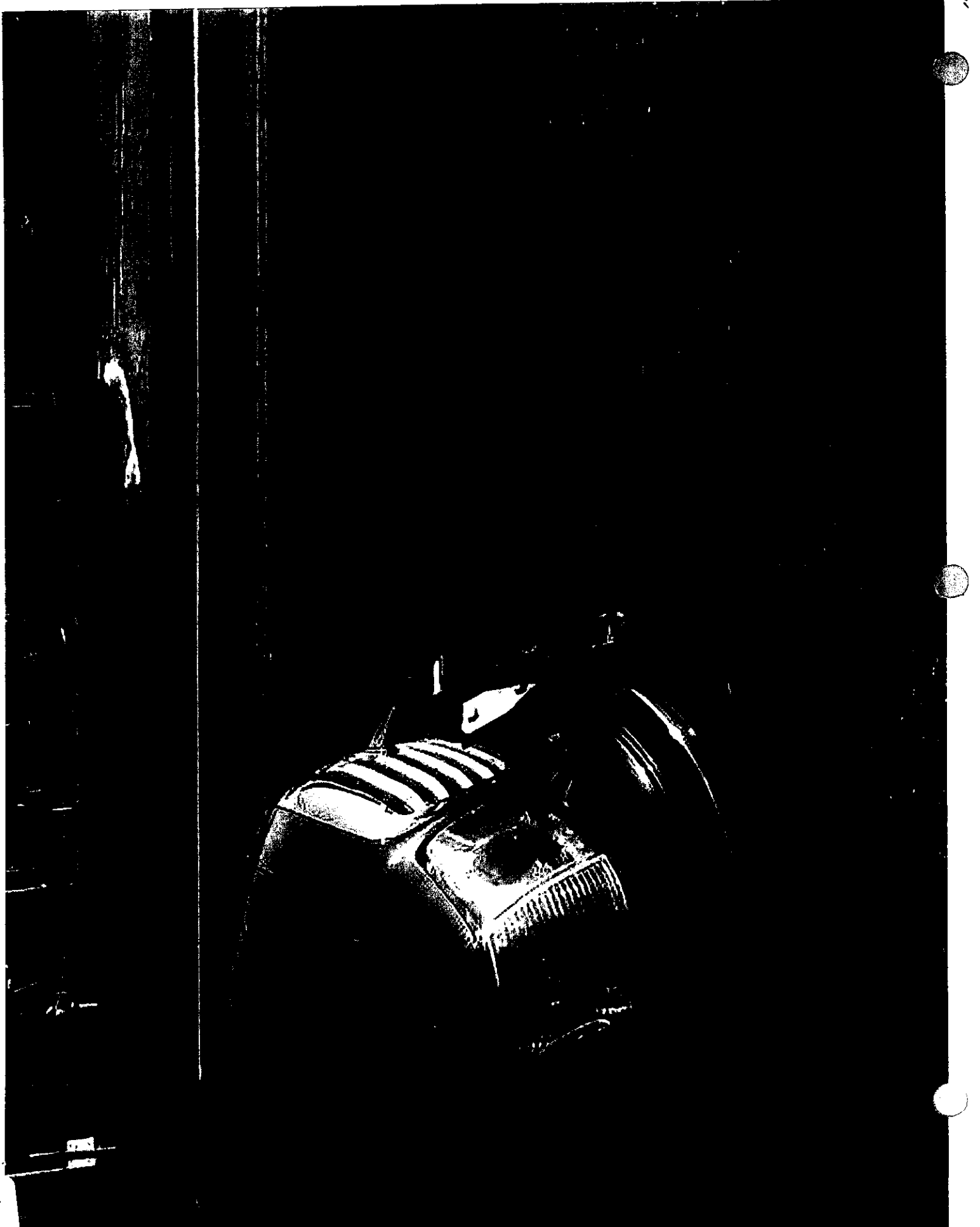
4

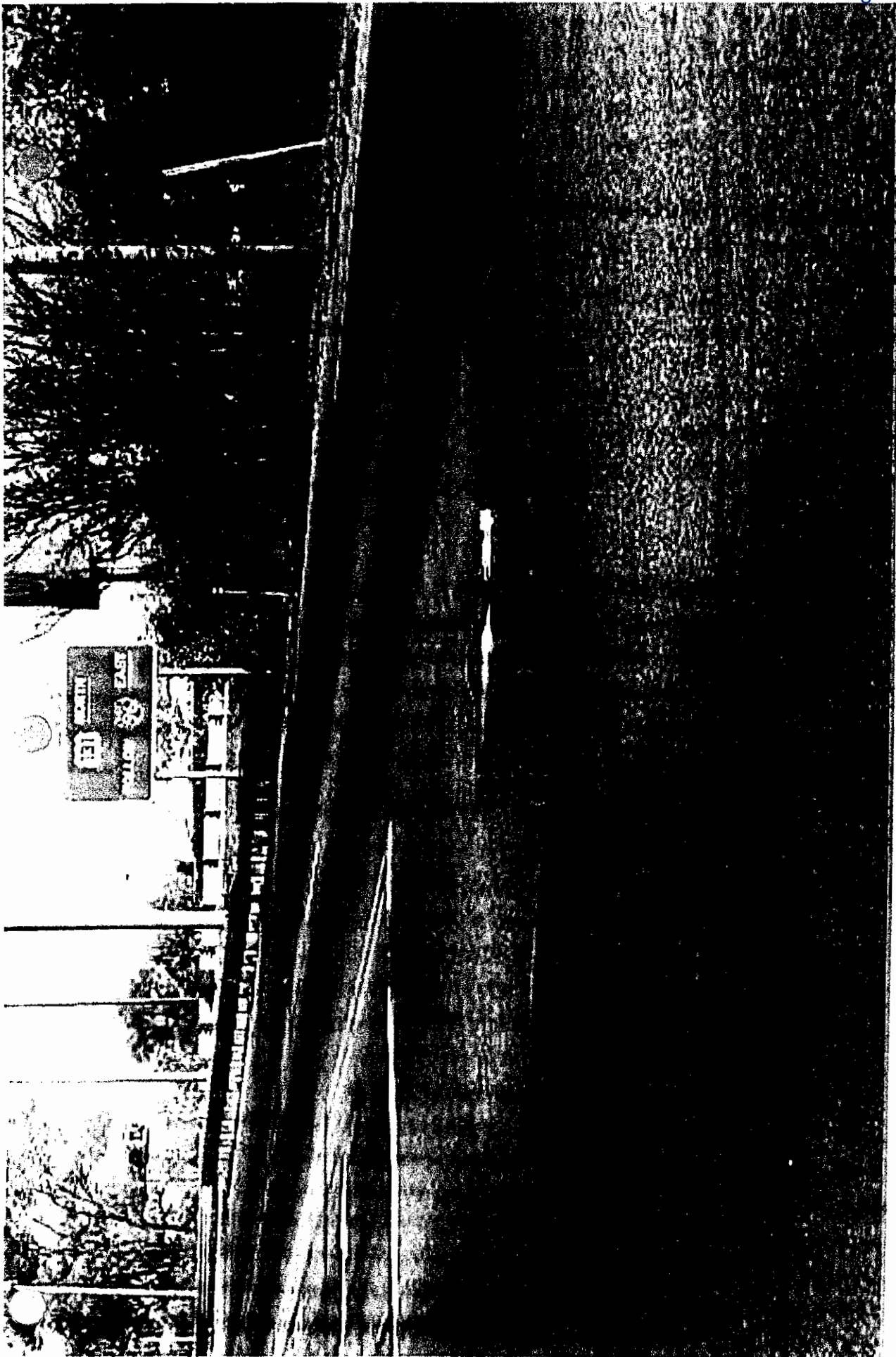
4

4

(5)

(5)





(9)

(9)

(9)

Traffic Crash Report

File Class

9300-1

Complaint Disposition

Reviewer

Open Closed

dmv

MI-4106100

Crash Date: 10/3/99
Crash Time: 10:11

County: 41
City: 69

Crash Type: 1. Single Motor Vehicle
2. Head On
3. Head On-Left Turn
4. Angle
5. Rear End
6. Rear End-Left Turn
7. Rear End-Right Turn
8. Sideswipe-Same
9. Sideswipe-Opposite
10. Other/Unknown

Special Circumstances: 1. None
2. Deer
3. School Bus
4. Hit and Run
5. Fleeing Police

Weather: 1. Clear
2. Cloudy
3. Fog/Smoke
4. Rain
5. Snow/Blowing Snow
6. Severe Wind
7. Sleet/Hail
8. Other/Unknown

Light: 1. Daylight
2. Dawn
3. Dusk
4. Dark-Lighted
5. Dark-Unlighted
6. Other Unknown

Road (Report All):
☐ Corrected Copy
☐ Replace (Entire Report)
☐ Delete (Entire Report)
☐ Non-Traffic Area
☐ ORV/Snowmobile

Department Name: MSP-ROCKFORD

Construction Zone (If applicable) (Mark One From Each Group):
Type: 1. Const./Maint. 1. Yes 2. No
Lane Closed: 1. Yes 2. No

Activity: 1. On Road 2. Off Road 3. None

Relation to Roadway: 1. On Road 2. Median 3. Shoulder 4. Outside of Shoulder/Curb 5. Gore 6. Other/Unknown

Area: 1. Dry 2. Wet 3. Icy 4. Snowy 5. Muddy 6. Slushy 7. Debris 8. Other/Unknown

Road Condition: 1. Dry 2. Wet 3. Icy 4. Snowy 5. Muddy 6. Slushy 7. Debris 8. Other/Unknown

Total Speed Limit: 0 0 0

Location on: ALPINE AVE

Name: 25

Intersection: 3 MILE RD

Unit Number: MI 500 730 035 497

Driver License Number: 062551

First Name: RASHID Middle: AHMAD Last: JAHM

Street Address: 3009 EASTERN APT 303E 559-6185

City: GRAND RAPIDS State: MI Zip: 49508

Unit Type: MV
Alcohol: H90
Test Type: Field
Breath: Urine
Test Results: Refused

Injury: Ejected Yes Citation Issued: 1. Hazardous 2. Other

Vehicle Description (year, make, color): 86 BUICK 2DR BRN

Vehicle Registration: RUP981 State: MI VIN: 1G4HR3736H460948

Insurance: STATE FARM Towed To: NONE

Location of Greatest Damage: 0 1 2 3 4 5 6 7 8 9 10 11 12

First Impact: 3

Extent of Vehicle Damage: 0 1 2 3 4 5 6 7

Drives: Yes No

Vehicle Type: PA VA PU ST CY MO GC SM OR Other Truck/Bus (Complete Truck/Bus Section)

Vehicle Direction: North East South West

Vehicle Use: 1 2 3 4 5 6 7 8 9 10 11

Vehicle Defect: 1 2 3 4 5 6

Private Trailer Type: 1 2 3 4 5 6 7

First Name: Middle: Last:

Street Address: Phone Number:

City: State: Zip:

Date of Birth: Month: Day: Year:

Sex: M F Ejected: Yes No Trapped: Yes No

Injury: K B O

Airbag Deployed: 1. Yes 2. No 3. Not Equipped

Pos. Rest. Ambulance/Hospital:

First Name: Middle: Last:

Street Address: Phone Number:

City: State: Zip:

Date of Birth: Month: Day: Year:

Sex: M F Ejected: Yes No Trapped: Yes No

Injury: K B O

Airbag Deployed: 1. Yes 2. No 3. Not Equipped

Pos. Rest. Ambulance/Hospital:

Witness: Driver Name: Address: Phone Number: Age: Pos. Post.

Uninjured Passenger:

Witness: Driver Name: Address: Phone Number: Age: Pos. Post.

Uninjured Passenger:

Person Advised of Damaged Traffic Control: Date: Time: Name: Damaged Property: Public Owner & Phone:

Do Not Write or Mark in This Area

LD-10 Form Number: 9012597

Form Overlays Number:

First Name EUGENE EDWIN		Last KARS		Position 1	Restraint 4	Ambulance/Hospital NONE
Street Address 4278 YORKSHIRE DR		Phone Number 659-2561		Injury K	Ejected Trapped	Citation Issued 1. Hazardous 2. Other NONE
Unit Type AV	City HUDSONVILLE	State MI	Test Type 49426	Airbag Deployed 1. Yes 2. No 3. Not Equipped		
Alcohol HBO	Field PST	Breath Urine	Test Results Refused	Vehicle Description (year, make, color) 98 FORD LTD BLU		
Vehicle Registration 253X38		State MI	VIN 2FAPP7WXX47363	Vehicle Direction North		
Insurance MIKH. MUNICIPAL LIABILITY		Towed To By NONE		Special Vehicles 1 2 3 4 5 6		
Location of Greatest Damage 0 1 2 3 4 5 6 7 8 9 10 11 12		Vehicle Type PA CY OR VA MO Other PU GC Truck Bus ST SW (Complete Truck Bus Section)		Vehicle Use 1 2 3 4 5 6 7 8 9 10 11		
First Name First		Middle Extent of Vehicle Damage		Last Drivable		Date of Birth Month Day Year
Street Address		Phone Number		Sex M F		Ejected Trapped
City		State		Zip		Injury K B C
First Name		Middle		Last		Airbag Deployed 1. Yes 2. No 3. Not Equipped
Street Address		Phone Number		Sex		Ejected
City		State		Zip		Injury
Witness		Owner Name		Address		Phone Number
Uninjured Passenger		Age		Pos		Rest

Unit Reported on Front

Action Prior	First	Second	Third	Fourth
0	0	0	0	0
1	1	1	1	1
2	2	2	2	2
3	3	3	3	3
4	4	4	4	4
5	5	5	5	5
6	6	6	6	6
7	7	7	7	7
8	8	8	8	8
9	9	9	9	9

Most Harmful: **M M M**

Unit Reported Above

Action Prior	First	Second	Third	Fourth
0	0	0	0	0
1	1	1	1	1
2	2	2	2	2
3	3	3	3	3
4	4	4	4	4
5	5	5	5	5
6	6	6	6	6
7	7	7	7	7
8	8	8	8	8
9	9	9	9	9

Most Harmful: **M M M**

Truck/Bus Information

Carrier Name MIKH. MUNICIPAL LIABILITY	Unit No. 253X38
Address 4278 YORKSHIRE DR	
City HUDSONVILLE	
Carrier Source Papers	GVWR 25,000
Vehicle Log Book	Driver's CDL Type A
ICCMC USDOT	CDL Restrictions 29 35 36
MPSC Medical Card	CDL Exempt None
Interstate Y	Farm Other
Type & Axles Per Unit 1 2 3 4 5 6 7 8	Hazardous Material Placard Cargo Spill
Body Type 1 2 3 4 5 6 7 8	Class 1 2 3 4 5 6 7 8

Crash Diagram and Remarks
<p>#2 WAS RESPONDING TO ALARM W/ LIGHTS SIREN ACTIVATED. #2 STOP, WAITING FOR NB TRAFFIC, THEN ATTEMPTED TO TURN RIGHT. #2 STRUCK #1 WHO WAS SB. #1 STATED HE NEVER SAW LIGHTS OR HEARD SIREN.</p>

UD-10 Form Number
9012597Investigated at Scene
10-31-99/1011 HRSReported Date/Time
10-31-99/1011 HRSInvestigator Name(s) & Badge # (Print Only)
TRD. K. ENRKE #1632

Notice of Award

Office of Central Operations
1500 Woodlawn Drive
Baltimore, Maryland 21241-1500
Date: September 29, 2002
Claim Number: 106-66-0721HA

RASHID A JAHM
3009 EASTERN SE
APT 303E
GRAND RAPIDS, MI 49508-1368

XX

You are entitled to monthly disability benefits beginning August 2001.

The Date You Became Disabled

We found that you became disabled under our rules on February 6, 2001.

However, you have to be disabled for 5 full calendar months in a row before you can be entitled to benefits. For these reasons, your first month of entitlement to benefits is August 2001.

What We Will Pay And When

- You will receive \$6,013.00 around October 5, 2002.
- This is the money you are due for August 2001 through August 2002.
- Your next payment of \$469.00, which is for September 2002, will be received on or about the fourth Wednesday of October 2002.
- After that you will receive \$469.00 on or about the fourth Wednesday of each month.

The day we make payments on this record is based on your date of birth.

Enclosure(s):
Pub 05-10153

REC'D & FILED

DEC 10 2002

JUDGE LEIBER
17TH JUDICIAL CIRCUIT

If you do call or visit an office, please have this letter with you. It will help us answer your questions. Also, if you plan to visit an office, you may call ahead to make an appointment. This will help us serve you more quickly when you arrive at the office.



W. Burnell Hurt
Associate Commissioner for
Central Operations



Building Inspections Department

Telephone 616/530-7285 Fax 616/249-3484
1155 - 28th Street, S.W., Box 905 Wyoming, Michigan 49509-0905



Tuesday, August 19, 2003 Web: www.ci.wyoming.mi.us

NOTICE OF CONDEMNATION

MAYOR
Douglas L. Hoekstra, Jr.

COUNCILMEMBER-AT-LARGE
Carol S. Sheets

COUNCILMEMBER-AT-LARGE
Jack A. Poll

COUNCILMEMBER-AT-LARGE
Kevin J. Green

COUNCILMEMBER 1ST WARD
William Ver Hulst

COUNCILMEMBER 2ND WARD
Richard K. Pastoor

COUNCILMEMBER 3RD WARD
Dawn E. Wichmann

CITY MANAGER
Curtis Holt

AMSTERDAM GARDENS ASSOC
3007 EASTERN AVE SE
GRAND RAPIDS MI 49508-1320

THE CHOICE GROUP
SHOUHAYRB INVESTMENT CO.
CHOICE DEVELOPEMENT CORP.
755 BIG BEAVER ROAD, STE 1275
TROY MI 48084

DESCRIPTION OF PROPERTY: 3003 SE EASTERN AVE 3011
PP#41-18-18-276-012

This letter is to notify you that the above property has been posted with a "NOTICE of CONDEMNATION" sign by the Wyoming Department of Inspections on 08/18/03 because it does not conform to the requirements of the Wyoming Property Maintenance Codes. The items checked below indicate the reasons for posting:

- ☒ Alteration or damage to existing buildings.
- ☒ Unsafe buildings, Wyoming Property Maintenance Code
- ☒ Unsafe Wiring, plumbing or heating.
- ☒ Unsafe chimney or vent.
- ☒ Unsanitary conditions.
- ☒ Lacks required facilities.
- ☒ Faulty water and/or sewage system.
- ☒ Rodent or vermin infestation.
- ☒ Inadequate light and ventilation.
- ☒ Inadequate or unsafe exits.
- ☒ Improperly maintained.
- ☒ Exterior structure not in compliance.
- ☒ Interior structure not in compliance.

The following sections of the Property Maintenance Code have been violated because of the above: Dangerous Building PM-110.1(a)(1)(3)(6)(8)
Property Conditions: Code sections as applicable in repair notices previously sent Chapter 10-176 through 10-180 of the City of Wyoming Code.

A Housing Board of Appeals meeting has been reserved for Sept. 4, 2003 at 7:00p.m. at the City Hall Council Chambers should an interested party desire to appeal.

RIGHT OF APPEAL: Any person who is aggrieved with the ruling or decision of any City Official may appeal such ruling or decision to the Housing Board of Appeals. Such appeal shall be in writing on the form supplied by the Inspections Dept., and shall be filed within 10 days of the posting of this notice.

Occupancy or use of the building after August 19, 2003 is prohibited by law until the necessary corrections are made and permission to occupy is granted. The premises will be reinspected on or about Sept. 25, 2003 for compliance with this directive.

CITY OF WYOMING

Gerald J. Meas
Gerald J. Meas
Director of Planning/CD/Inspections

James W. DeLange
James W. DeLange
Chief Building Official

Remee
HH:-
Kelzaw
Section 8 Specialist

L. Roland Roegge
 Thomas F. Blackwell
 P. Laurence Mulvihill
 Thomas R. Tasker
 Lance R. Mather
 Charles F. Behler
 Gary A. Rowe
 Edward R. Stein
 William W. Jack, Jr.
 William J. Hondorp
 Thomas M. Weibel
 James G. Black
 E. Thomas McCarthy, Jr.
 Glenn W. House, Jr.
 Craig R. Noland
 Paul M. Chenczak
 Craig S. Neckers
 George F. Bearup
 John C. O'Loughlin
 Anthony J. Quarto

A. B. Smith, Jr.
 David O. Haughey
 Lawrence P. Mulligan
 Albert T. Quick
 Brenda Jones Quick
 Of Counsel

John M. Kruis
 Paul Van Costenburg
 Mark P. Bickel
 William R. Jewell
 Jon D. Vander Ploeg
 Patrick F. Geary
 R. Jay Hardin
 Terence J. Ackert
 Brian J. Kilbane
 Charles B. Judson
 Robert C. Stone
 Robert W. Tubbs
 Douglas G. Powe
 Richard C. Kraus
 Albert J. Engel, III
 Phillip K. Mowers
 Carol D. Carlson
 Marilyn S. Nickell Tyree
 Christopher R. Gendler
 Beth S. Kromer

Robert V. V. Rice
 1899-1982

SMITH HAUGHEY RICE & ROEGGE
 A Professional Corporation
 ATTORNEYS AT LAW
 200 Calder Plaza Building
 250 Monroe Avenue, N.W.
 Grand Rapids, Michigan 49503-2251
 Telephone 616-774-8000
 Fax 616-774-2461

1400 Abbott Road, Ste. 410
 East Lansing, Michigan 48823-1902

202 E. State Street, Ste. 100
 Traverse City, Michigan 49684

320 N. Main Street, Ste. 101
 Ann Arbor, Michigan 48104-1127

<http://www.shrr.com>

Robert M. Kruse
 Jeffrey R. Wonacott
 Aileen M. Leipprandt
 David J. DeGraw
 Robert W. Parker
 Paul T. Jarboe
 Jeffrey E. Gwillim
 Randall L. Velzen
 John R. Oostema
 Matthew L. Meyer
 Martha P. Forman
 Todd W. Millar
 Veronica A. Marsich
 Karl W. Butterer, Jr.
 Garrett J. TenHave-Chapman
 Peter J. Boyles
 Thomas R. TerMaat
 Jane C. Hofmeyer
 William A. Sikkil, IV
 Rachel Brochert Roe

Laurence D. Smith
 1913-1980

Jo Beth Earl
 Angela T. Ross
 Eric W. Phelps
 Kevin M. Lesperance
 Heather R. Blanton-Dykstra
 Timothy D. Vandenberg
 Jeffrey J. Noorman
 William L. Henn
 Kirk W. Morgan
 Mark A. Gilchrist
 Brian A. Molde

Also licensed in:
 1 Colorado
 2 District of Columbia
 3 Florida
 4 Illinois
 5 Indiana
 6 Pennsylvania
 7 Wisconsin
 8 Georgia

Michael S. Barnes
 1944-1989

September 19, 2002

Writer's Direct Dial Number
 (616) 458-9466

Stephen C. Bransdorfer
 BRANSDORFER & RUSSELL, LLP
 161 Ottawa N.W., Ste. 411-S
 Grand Rapids, MI 49503-2898

Re: Rashid Jahm v Eugene Kars and City of Walker
 Case No. 00-08794-NI
 Our File No. 70483

Dear Mr. Bransdorfer:

Confirming our telephone discussion of September 19, please advise your client not to communicate with my client. Also, please advise your client not to make false accusations. Thank you.

Very truly yours,

SMITH HAUGHEY RICE & ROEGGE




Craig R. Noland

CRN:rad

BRANSDORFER & RUSSELL, LLP

MEMORANDUM

To: File
From: SCB 
Date: October 4, 2002
Client: Jahm

The following memorandum is dictated following the hearing on October 4, 2002, before Judge Leiber regarding: (1) the Motion for this firm to Withdraw as Counsel and (2) the Entry of Judgment based on the jury verdict.

The hearing for these motions was scheduled for 8:30 a.m. based on the Kent County Clerk's office indication that civil hearings would be held today by Judge Leiber at that time. The commencing time was wrong. Judge Leiber was scheduled to hold civil case hearings today commencing at 1:30 p.m. Accordingly, Rashid Jahm, SCB and Craig Noland waited an hour and a half before Judge Leiber came to court.

After he arrived, he discussed the pending motions in chambers with Attorney Noland and SCB. He apologized for the misunderstanding as to the time of commencement. He agreed to hold the hearings that morning. Among the matters discussed by Noland in chambers was his concern that Rashid Jahm might pose a physical threat to him. The Judge said he had been threatened many times and that Noland could treat his concern accordingly as he saw fit.

The hearing in open court on the Motions was held commencing at 10:15 a.m.

The first matter heard was the motion for this firm to withdraw as counsel. After SCB's presentation the Judge asked Rashid Jahm to respond. The thrust of his response was that he did not object to the motion but felt he was improperly treated at trial. The Judge told him to bring that up at the hearing on Entry of Judgment. During this part of the proceeding the Judge stated that he had received a letter with handwriting from Rashid Jahm regarding the Judgment. He asked Rashid Jahm as to whether a copy was sent to Noland. Jahm said, "No." The Judge told him that this was wrong and that on any matters that go to a Judge, he must give opposing counsel a copy of all such materials.

Following the hearing on this matter, the Judge stated he would enter the Order Allowing Withdrawal of this firm as counsel. The Order was then entered as prepared by SCB. A copy was then served personally on Noland and Jahm by SCB.

The next matter to be heard was Entry of the Judgment. Noland made a brief statement indicating that the Judgment was based upon the entry of the verdict in favor of defendants based on its finding in the jury verdict form; that there was no negligence or gross negligence. The Judge then called on Rashid Jahm for his response. The Judge said that he had received from Jahm a statement giving notice that Attorney Noland had committed fraud and defamation. The contents of that letter and its attachments were not read into the record but were kept by the Judge. He made a copy of those materials and gave them to Noland.

Jahm then made a statement to the Court making specific complaints about why the trial was not conducted fairly and contained prejudicial statements made by Noland. He referred to "9-11." He also referred to Officer Kars not putting on the brakes of his car when he struck Rashid Jahm's car. He showed the Judge two pictures of the post that Rashid Jahm's car hit when sliding off the road in the second automobile accident when he was returning from Ann Arbor. The Judge told him that had these been submitted, he would not have permitted them into evidence because of the confusion those exhibits would have created. The Judge said, "That accident was not on trial." Following a heated and oblique type recitation by Jahm, the Judge raised his voice and told him to be quiet. He said the court reporter could not take down his statements because he was talking so fast.

Following the presentation by Jahm, Judge Leiber said that he was treating the information that Jahm supplied to the Judge at this hearing as a motion for a new trial. He then said he was denying the motion for a new trial for the reason that the proofs indicated that there was no negligence or gross negligence. He said the proofs showed that Officer Kars looked to his left before going into the intersection and striking Jahm's car. He said the vision was blocked by two vehicles that had stopped to the left of the intersection. Accordingly, he said this was a "accident without fault on any party." The Judge then said, "It's your decision whether you or your lawyer take an appeal." He referred to Rashid Jahm getting the Michigan Rules of Court by calling 1-800-328-9352. The Judge explained to him that he or his other possible lawyer had to comply with the Michigan Rules of Court as to any possible appeal.

The Judge then signed the Judgment and gave confirmed copies to Noland. Noland attempted to hand a copy to Jahm. Jahm refused to accept it saying, "Put it in the mail." Judge Leiber then shouted to Jahm, "You take that paper now. I am directing you to take that now." Jahm then accepted the copy of the Judgment.

Upon returning to the office, SCB prepared a letter of today's date, 10-4-02, to Rashid Jahm enclosing the Proof of Service of the Order of Withdraw of Counsel. The letter to Jahm was mailed today also enclosing a copy of the Judgment and a copy of the applicable court rules dealing with judgment and possible appeal. The letter also stated that this office would be fully cooperative in making available all files in this case.

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF KENT

RASHID A. JAHM,

Plaintiff,

Case #00-08794-NI

v

CITY OF WALKER, a Michigan
Municipal Corporation and
EUGENE KARS,
Defendants.

MOTIONS
BEFORE THE HONORABLE DENNIS B. LEIBER
Thursday, October 4, 2002 - Grand Rapids, Michigan

APPEARANCES:

FOR THE PLAINTIFF: Stephen C. Bransdorfer (P11133)
161 Ottawa Ave, NW, Ste 411-S
Grand Rapids, MI 49503
(616) 774-8422

FOR THE DEFENDANT: Craig R. Noland (P30717)
200 Calder Plaza Bldg
250 Monroe NW
Grand Rapids, MI 49503
(616) 774-8000

COPY

Reported by: Shawn M. Breimayer, CSR (6888)

TABLE OF CONTENTS

WITNESSES:
(None)

EXHIBITS:
(None marked)

1 (Hearing commenced at 9:53 AM)

2 THE COURT: Mr. Jahm, would you come forward,
3 please, to sit at the table?

4 MR. JAHM: Sir, I have to say something.

5 THE COURT: Yes. I'll give you a chance, but just
6 have a seat, please. I want to announce the cases and make
7 a proper record. If you let me do my job, I will give you
8 an opportunity to do yours as well. This is case number
9 00-08794-NI, in the matter of Rashid Jahm versus the City
10 of Walker. Present are the plaintiff and his attorney
11 Stephen Bransdorfer, and appearing on behalf of defendants
12 is Craig Nolan.

13 These matters were scheduled for apparently 8:30
14 this morning consistent apparently with our former practice
15 historically through 1998, but, as of that date, all civil
16 and criminal motions then became, by administrative order,
17 to be heard on Friday afternoon beginning at 1:30 and all
18 domestic matters are heard at 8:30. I know that's
19 confusing, but that explains, I hope, to Mr. Jahm's counsel
20 why I wasn't immediately available at 8:30. I simply did
21 not anticipate nor did I receive notice of that date.

22 It's a matter of inconsequence except for the
23 inconvenience it's caused these parties unintentionally and
24 unintended by the hour now being 10:00 o'clock. I assure
25 you I haven't been idle. I have been working on other

1 motions. I worked late last night, which is why I came in
2 late this morning. Thank you for giving me the opportunity
3 to explain.

4 I will hear these motions. Mr. Jahm has filed a
5 motion card which was scheduled for 1:30, but I'll hear it
6 this morning as well. Two motions have been filed. Mr.
7 Bransdorfer, you may proceed.

8 MR. BRANSDORFER: Thank you, your Honor. The motion
9 that we have filed is a motion to withdraw as counsel for
10 Mr. Jahm. We've explained to him, as well as placed in
11 writing, the reason that that is required by us to be done.

12 It's done in accordance, as indicated in the motion,
13 with the rule of professional behavior, if you will, rules
14 of professional conduct 1.16, and it states as follows;
15 declining or terminating representation, except as stated
16 in paragraph C, a lawyer may withdraw from representing a
17 client if withdraw can be accomplished without material
18 adverse effect on the interest of the client or if -- and
19 sub 3 states, the client insists upon pursuing an objective
20 that the lawyer considers repugnant or imprudent.

21 And paragraph 5 of rule 1.16 states the
22 representation will result in an unreasonably financial
23 burden on the lawyer or has been rendered unreasonably
24 difficult by the client. And sub D, your Honor, which we
25 always refer to in the motion of rule 1.16 states upon

1 termination of representation, a lawyer should take
2 reasonable steps to protect a client's interest such as
3 giving reasonable notice to the client, allowing employment
4 of other counsel, surrendering paper or property to which
5 the client is entitled and refunding any payment or fee
6 that has not been earned the lawyer, retain paper of the
7 client to the extent permitted by law.

8 Your Honor, as indicated in the motion, we fully
9 intend and have indicated to Mr. Jahm to comply with rule
10 1.16 sub D, and have explained to Mr. Jahm and put this in
11 writing what steps he may take, assuming that the court
12 feels that it is necessary for us to and that we have a
13 basis for withdraw. In short, your Honor, the withdraw is
14 based on our inability at this point to have a
15 recommendation and the communications that we have been
16 making to Mr. Jahm understood and approved by him.

17 Specifically, this unfortunately started with the
18 document that is the subject of the second motion, and that
19 is a motion brought by opposing counsel. And that is to
20 approve, as to form, the judgment entered by the jury. We
21 do have the exhibits as the Court knows, they are given
22 back to counsel. We have those exhibits. There is a
23 stipulation that has not been executed as to the
24 transcripts that were read -- the de bene esse transcripts
25 that were read to the jury, the removal of materials,

1 objections and so on that were made during the deposition
2 transcripts that were -- when read to the jury, were no
3 longer applicable by agreement.

4 So, in short, your Honor, we would request that the
5 Court, after subject to its hearing from Mr. Jahm or
6 whatever other proceedings or questions you might have,
7 enter an order authorizing the withdrawal of counsel for
8 plaintiff Rashid Jahm. And we have a proposed order for
9 your review and signature.

10 THE COURT: Thank you. I'll hear from Mr. Noland
11 next, if he wishes.

12 MR. NOLAND: Your Honor, I have no objection to the
13 motion, and I did speak with Mr. Bransdorfer about the
14 concern of keeping track of the trial exhibits and
15 depositions in the event of an appeal of post-trial
16 proceedings, so I have no objection to the motion.

17 THE COURT: Mr. Jahm, do you wish to be heard?

18 MR. JAHM: Yes, sir.

19 THE COURT: This is on the motion to withdraw?

20 (MR. JAHM: First, I think that there will be unfair
21 with me because of the way that the situation that I'm in.
22 And, as you mentioned, your Honor, that the picture that I
23 object on the tampering of the picture, and your Honor
24 argued me that you do not talk. When your turn comes, your
25 attorney will ask you about the picture. I waited for him

1 to ask me for which I can tell the jury which the picture
2 he's presenting to, the tampered picture, that not the
3 right picture. I can prove those things. I have a lot of
4 --)

5 THE COURT: Excuse me. I don't mean to interrupt
6 you. We have two separate motions. One deals with the
7 order that Mr. Noland has and the other is for Mr.
8 Bransdorfer seeking to withdraw.

9 MR. JAHM: Right.

10 THE COURT: Mr. Bransdorfer doesn't want to
11 represent you anymore. That's what I want you to address.
12 Do you want him to represent you or not?

13 MR. JAHM: I think I don't want him to represent me,
14 because it's a breach of contract.

15 THE COURT: So, you don't oppose the motion; is that
16 correct?

17 (MR. JAHM: I think I want to Court to listen --

18 THE COURT: You want to what? I'm sorry.

19 MR. JAHM: I want -- I want, your Honor, to look
20 into that as why he want to pull in a situation where I
21 need the most legal kind of help, and he, on the spot here,
22 his position send me a letter for seven days that I have to
23 answer that and the other side he want to pull out that.
24 So, it's kind of something that is professional conduct is
25 not. He could have done it before the trial.

1 THE COURT: Just a moment. Just a moment. Just a
2 moment. I'm not going to engage in any discussion with you
3 about Mr. Bransdorfer's representation of you. The motion
4 that he presents and that you don't object to, he seeks to
5 withdraw from representing you. According to the rule, you
6 just don't get along, you won't listen and you have your
7 own ideas and he can't possibly give you advice that you
8 won't follow. The motion to withdraw is granted. He will
9 not be your lawyer anymore.

10 MR. JAHM: Right. But, your Honor --

11 THE COURT: This is not the forum --

12 MR. JAHM: Your Honor --

13 THE COURT: This is not the forum. This is not the
14 place to engage in discussions about how you think the
15 trial went or how it should have gone. That is not my
16 role, and this is not the courtroom for that. And so, I
17 want to tell you, at least that while I appreciate you have
18 strongly held opinions in this area, you can address that
19 in the Court of Appeals if you wish an appeal or some other
20 forum, but this is not the place for it.

21 The other thing I'm obliged to tell you in the
22 context of the next motion is that I received, as you did,
23 from Mr. Bransdorfer this proposed judgment. And you sent
24 it back to me, because you didn't send a copy of what you
25 sent me to Mr. Noland; did you?

1 MR. JAHM: No, I didn't send it there.

2 THE COURT: That's unethical and that's wrong, and
3 let me explain why. Judges dealing with cases have to do
4 all of their work, as I did in this case as I do in every
5 case, in the open. When I had a conference about your case
6 away from the bench it was both your lawyer and the other
7 side's lawyer together. I cannot possibly communicate with
8 you one-on-one without letting the other side know what's
9 going on.

10 You wouldn't like that, Mr. Jahm, if, in this trial,
11 I had conversations about you or this case just with Mr.
12 Noland and didn't tell you about them. That would be
13 unfair. What you're asking me to do is have conversations
14 with you and communications by writing me without letting
15 Mr. Noland know what you're doing. That's not right.

16 MR. JAHM: Well, your Honor, I understand -- I
17 understood, because I should -- the whole idea was he send
18 me a letter to attorney and client -- I did not have an
19 attorney. He don't want to represent me. Within seven
20 days I have to answer the court.

21 THE COURT: He sent a letter? Who, he, Mr. Noland
22 sent a letter to your attorney?

23 MR. JAHM: Right.

24 THE COURT: He also sent a letter to me. What Mr.
25 Noland does, he shows both sides. If you have to respond,

1 I'll listen to your motion. I'll listen to your side, but
2 it's his motion so he goes first. But you can't, when you
3 write me, you can't write me alone. I'm not your personal
4 correspondent. I'm not your advisor. I'm the judge, and
5 what you say to me he has to know about this case. What he
6 says to me about the case you have to know about it. He
7 has to give you copies of anything he writes me, you must
8 give him copies of anything you write me.

9 MR. JAHM: The reasons, your Honor, I did not is
10 because --

11 THE COURT: I'm not asking. You don't have to
12 explain.

13 MR. JAHM: Okay.

14 THE COURT: I'm educating you. You have to take it
15 from me that that's the rule.

16 MR. JAHM: Thank you.

17 THE COURT: If you don't know the rule, you were
18 ignorant and now you're not ignorant anymore. Please sit
19 down. I'll hear from Mr. Noland next and you'll have a
20 chance to respond to the motion.

21 MR. BRANSDORFER: Here is the order, your Honor.

22 THE COURT: Mr. Noland, why don't you proceed on the
23 motion.

24 (MR. NOLAND: Your Honor, we have filed a motion
25 originally a request under the 7-day rule for entry of

1 order and for reasons already indicated in the motion
2 proceedings. That was not agreed to as to form. We
3 subsequently filed a motion for entry of order. With the
4 Court's permission, I would like to hand the Court a
5 proposed judgment and show Mr. Jahm a copy.

6 For the record, this is the identical form of the
7 proposed judgment that had been originally tendered, and we
8 believe that the judgment is appropriate in view of the
9 trial court proceedings and the response of the jury to the
10 verdict form and ask that this order be entered today.

11 Thank you.

12 THE COURT: Mr. Jahm, you may respond.

13 MR. JAHM: Yes, sir. May I present this one, sir?

14 THE COURT: Yes. Do you have a copy for Mr. Noland?

15 MR. JAHM: Right. I have a copy for him too.

16 THE COURT: This is entitled notice of fraud and
17 defamation and malice by Mr. Craig Noland.

18 MR. JAHM: Right.

19 (THE COURT: Let me read this first. You say that
20 documents are attached with this question.

21 MR. JAHM: Yes, sir. This is actually the Social
22 Security Administration did, which he --

23 THE COURT: Do you have copies of these for Mr.
24 Noland?

25 MR. JAHM: No, sir.

1 THE COURT: What have I told you?

2 MR. JAHM: I can provide him and give them to him.

3 THE COURT: I'll only do this once. I'll make
4 copies for Mr. Noland. I want to make sure he has
5 everything, like I told you. Now, I'm going to continue
6 reading this a moment, please. Now, let me explain
7 something that you may not know and it may change your
8 opinion in this matter. What was asked of me today by the
9 defense is to enter an order, a copy of which you've
10 received which is entitled judgment for defendants. Before
11 a person can take an appeal to the proper court to argue,
12 if they want, about how bad the trial was or how unfair the
13 trial was, there has to be an order entered in the court
14 file which says what happened at the end of the trial; do
15 you understand what I've just said?

16 MR. JAHM: No, I didn't.

17 THE COURT: I'll try and say it another way. My
18 clerk is now giving Mr. Noland copies of that which Mr.
19 Jahm has given as the attachment to this motion in your --
20 which you've given me today. You've raised a number of
21 issues about why you think the trial was unfair; am I
22 correct?

23 MR. JAHM: Correct.

24 THE COURT: And I've tried to say to you that this
25 courtroom, this building and me as the judge is not the

1 person or the place where you take this complaint. If you
2 complain about a trial and it's unfair, the proper place
3 for this is the Court of Appeals. That's the building at
4 the corner of Ottawa and Michigan. Those are different
5 judges. There are three judges. And they don't hear the
6 trial all over again, they read what you write, they review
7 the transcript of the trial, this woman which is here who
8 is typing everything down, she was here a couple days, my
9 regular court reporter was here couple of days, all the
10 people who were doing that you have to pay them money to
11 prepare a written record of what happened in the trial.

12 So, you take that written record and your complaint
13 and you go to Ottawa Street and you do it according to
14 these rules. That's why today this notice of fraud and
15 defamation and malice of whatever you call, this thing
16 isn't properly before me and won't be heard, because it's
17 not what a trial court does. This is what an appeals court
18 does.

19 (MR. JAHM: Yes, sir. The reason that I'm bringing
20 it to your attention that before you sign it why I ask the
21 Court to not to sign this, because this is all based on a
22 master minding and bringing this situation of a violation
23 of the due process statute.)

24 THE COURT: Time out. I understand. I read your
25 motion. But what I told you earlier was this, I am not

1 expecting you liked the result of this trial. I understand
2 that. You lost. You lost big. No question. This order
3 only says hey, you know, at the end of trial what was the
4 results, Mr. Jahm lost. Now, you can't change that fact.
5 You don't like it. I understand that.

6 But what he's asking, Mr. Noland is saying this a
7 legal way, in a polite way is the judgement, the record.
8 This court file isn't complete because there's nothing on
9 paper in writing which says what happened at the end of the
10 trial. Before you can go to Ottawa Street and argue your
11 case in front of them, if you follow the rules, there's got
12 to be one of these in there which tells the judges on
13 Ottawa Street what happened at the trial.

14 MR. JAHM: Right.

15 THE COURT: So that's why I have to enter the order,
16 because the order says -- or the judgment says Mr. Jahm
17 lost big. It didn't really say it in those words, but
18 that's what it means. You somehow don't want me to sign
19 this order.

20 (MR. JAHM: I request, your Honor, it should not be
21 because that's the base of fraud. It should not be.

22 THE COURT: That's not a basis to do that.

23 MR. JAHM: So, I want to know the Court to -- so
24 this way I, please, I can tell the other court which I have
25 been to twice Supreme Court, high court of Lansing. They

1 say the way you feel you go tell the judge and that's what
2 I did, and I give you the paper.

3 And he mentioned I did not get the proof from the
4 Social Security disability, which I've been approved.

5 That's approved there. Then I have a some -- that he
6 mention of 9-11, which is ^{did not} not related to that case was.

7 And not even -- your -- he objected and my attorney did not
8 ^{my own Attorney object} object to that. ^{Your Honor object to 9/11 and being Pakistani} How that will be affect on the court --
^{care}

9 I mean, the result of this due to your -- naturally
10 on the base of that, the outcome was. Your Honor knows
11 what the outcome is, because based on the evidence that the
12 doctors, based on the evidence that I have that is, I think
13 that this is good case. Even Mr. ~~Kars~~ he admitted he did
14 not put the brake. Why he did not, he didn't know why he
15 didn't put the -- he knows that he's going for -- where he
16 got that.

17 (Where the bringing of the two car that they were
18 braking there where the police report there's no two cars
19 that that's a false report. I never saw those police
20 reports. False. Say there's two cars waiting for there.
21 This is because he make up the lie and fabrication master
22 minding. Then I should sit there and back and listen and I
23 should not be heard. I was crying all the time two weeks
24 because I could not say anything to him, because I actually
25 tell my own attorney, I said, please, can you tell him he

1 should not attack me personal and bring it to my -- that is
2 a lie. That's under PRE 405 and 404. No correct --

3 THE COURT: Slow down. You're talking too fast. My
4 court reporter can't keep up with you, and I don't know
5 what PRE is. What is PRE?

6 MR. JAHM: Well, I don't know. That's what I read
7 it in the law book, which I can explain it, you know. I
8 thought the Court will know what PRE mean.

9 THE COURT: Well, I don't know, sir. I have lots of
10 letters. I have to learn.

11 MR. JAHM: I'm sorry.

12 THE COURT: It has no magic significance.
13 Professional rule of evidence, I don't know what it is.

14 MR. JAHM: It says -- if you want me to read it, I
15 can read it.

16 THE COURT: No. It's just gobbledygook. It's
17 nothing unless there's a context. All of these concerns
18 that you have I'm not going to try to dissuade you --

19 MR. JAHM: Your Honor, who is the court reporter
20 that's reporting that?

21 THE COURT: This young lady is the court reporter.

22 MR. JAHM: She is the reporter.

23 THE COURT: She is taking everything down, but you
24 talk so fast because of your condition that I can't follow
25 you and we're not making a proper record. Now, I've tried

1 to explain to you that your concerns do not affect this
2 motion or judgment being entered, and this has to be
3 entered before you can pursue all of these claims that you
4 have, all these citations about PRES, the 9-11 issue that
5 you have written here.

6 MR. JAHM: Right.

7 THE COURT: All of that stuff doesn't go to me, it
8 goes to the appeals court. Here is the book of rules that
9 lawyers know they have to follow. You can get this book --
10 I don't know where you get this book, but this is the book
11 of rules. It's available for purchase. If you want a copy
12 of -- here's an 800 number where you can buy a copy of the
13 book of rules; do you want to write it down?

14 MR. JAHM: Right, sir.

15 THE COURT: All right. It's 1-800-238-9352. Do you
16 wish me to repeat it?

17 MR. JAHM: No, sir.

18 THE COURT: That's an 800 number. What you want is
19 the Michigan Rules of Court. I'm not suggesting you must
20 represent yourself. I'm also suggesting that people are
21 better off if they're represented by a lawyer, but that's
22 your decision whether you or a lawyer are going to take
23 these complaints to the Court of Appeals. You or the
24 lawyer have to follow these rules.

25 And I respect that you did not agree with the result

1 of the trial. I understand that. I respect you believe
2 that the reasons are among these and others. I'm going to
3 put this in the court file, have it received so it becomes
4 a permanent record. I've given it to my clerk for that
5 purpose now and I'm going to sign the order, because the
6 order merely reflects what happened at the end of the
7 trial, that you lost.

8 MR. JAHM: Right. But I just only mention to the
9 Court because why I think the Court should not sign it,
10 because it was a violation of my constitutional basic
11 rights, and so, on that base, I personally think that this
12 trial should be retrialed here before we go to the appeal
13 court. And that's all I can say.

14 THE COURT: All right.

15 MR. JAHM: And the reason is, I cannot afford the
16 attorney and all these whatever it comes it may be -- will
17 be a -- responsibility will be on whoever will be involved
18 with this making any kind of to say on that is, because I
19 financial situation with my other disability that I cannot
20 handle fees which he left to me. And a situation where I
21 don't have the ability financial to represent -- I mean, go
22 and have attorney and no attorney will take that, and I do
23 request the Court finally, if Court can retrial that at
24 retrial.

25 I think it would be a benefit to me. Even in the

1 failed kind of way I think we can -- it's a question of my
2 life. I mean, it's not just something -- I cannot live on
3 \$469, which is the disable, which has been approved by the
4 state. (And those are the independent doctors board of
5 doctors which they award me.) I think this is something
6 that is a new proof that has came up and I think, your
7 Honor, you must consider that before you sign it.

8 THE COURT: I will consider all of what you said as
9 a motion for a new trial at the conclusion of the proofs.

10 MR. JAHM: Thank you, sir.

11 THE COURT: I will now give you my ruling, because I
12 presided over the trial, I was there every day just as you
13 were and I heard all the evidence. I am convinced, based
14 on that which I heard and saw from your testimony and the
15 testimony of Officer ~~K~~ars, that the -- and this the
16 simplest language I can say, accidents happen, accidents
17 happen, and that's exactly what happened here.

18 Officer ~~K~~ars proceeding into the intersection and
19 looking to his left had two cars that had been stopped
20 ahead of you stopped for that light. I think I said during
21 the course of the trial he looked to the left, but nobody
22 has x-ray eyes to see through those cars to see you, and I
23 am convinced, based on the testimony that I heard, that
24 when he looked you were proceeding in the direction towards
25 the intersection, as you testified, but that his vision of

1 you was impossible, not because of you and not because of
2 him, but because there were cars that were parked there and
3 didn't see you. He proceeded, you proceeded, and the
4 accident occurred.

5 Now, there have been a lot of medical testimony
6 about your condition, your cognitive disorder, and I guess,
7 maybe I don't know if that accounts for your excitability
8 as evidence here today, I don't know if that's why you
9 can't get along with your attorney, I don't know if that's
10 why you write these things with Mr. Noland in the motion
11 you have. I don't know if that has any substance, but I'll
12 leave that to the Court of Appeals.

13 There's also evidence in this case, Mr. Jahm,
14 according to your doctors, according to you, you had
15 another accident after this and hit some pole. I think it
16 was at 60, 65 miles an hour. That isn't this trial and I
17 remember the testimony of the doctors to say, sure you have
18 problems, but I'm not convinced that the problems you have,
19 if they exist, are because of this accident. It could may
20 well have been the other accident.

21 MR. JAHM: Your Honor, this is the picture.

22 THE COURT: This is the other accident.

23 MR. JAHM: This is the picture which I sent Mr.
24 Steve that -- can you present this, because it's not a
25 pole, it's just a little rod that they put the sign in.

1 That's what I hit there.

2 THE COURT: Well, still, who knows.

3 MR. JAHM: And that is what this is, another picture
4 of what that is.

5 THE COURT: Wait a minute. You know, I have got to
6 tell you something, these Polaroid pictures about you going
7 off the road on the highway and hitting this pole?

8 MR. JAHM: Right.

9 THE COURT: That wasn't this trial.

10 MR. JAHM: No. No.

11 THE COURT: Please understand me, I'm not going to
12 try this case and I wouldn't let this evidence in because
13 it would be confusing to the jury. As it was, your own
14 witnesses, your own doctors were unable to say when they
15 saw you after this second accident whether it was the
16 accident with the police car or the accident subsequently.

17 And you just don't go off the road at the speed that
18 you say -- and it was no kind of idle or simple stuff. You
19 complained about that accident and the effects to your
20 doctors. It had to be something to do. (I don't think the
21 patient is often the best judge of his condition.) In your
22 case --

23 MR. JAHM: This is for the record I'm showing the
24 pictures of -- those are not the pictures which I mentioned
25 to attorney that you should show the jury, which they

1 refused to present that picture, which is a pole. It's not
2 really pole. It's just a little rod there.

3 THE COURT: You know what, if you -- if he had tried
4 to present those pictures I would not have let them come
5 in, because you're throwing something else in the front of
6 the jury that they weren't supposed to consider.

7 MR. JAHM: Your Honor, if he is presenting that too,
8 that accident in front of the jury, where is the justice I
9 cannot present to the jury? He is saying that his car --
10 my injury is cause of that accident. I cannot present that
11 picture to the jury.

12 THE COURT: Rule 403 of evidence would be the
13 answer. You get the rules of evidence. I would say it
14 would be my judgment call under rule 403. If you want to
15 write that down, you can you can look it up once you get
16 the book. You asked me to review the case.

17 In a thoughtful way, I'm trying to show you the
18 greatest courtesy and patience I know, because you're not a
19 lawyer. But I'm trying to tell you in the most direct way
20 that I would not grant the motion for a new trial because
21 of my independent decision which reflects which the jury
22 said, that the officer was not negligent.

23 If the officer was not negligent I don't have to get
24 into an inquiry about your injuries, because they could
25 have happened from the accident in the snow. I kind of

1 think, okay, (that could have happened as a result of
2 hitting Officer Kars.

3 MR. JAHM: May I show you one thing, your Honor?

4 THE COURT: No. Because in either event, in either
5 event, whether your condition, as it was described because
6 of Officer Kars or the subsequent accident because Officer
7 Kars was not negligent you can't recover from the city
8 period.

9 MR. JAHM: Why not? It was directed verdict in }
10 front of you. Mr. Kars admit he did not put the brake and
11 he was -- why not direct verdict and Mr. -- he mentioned
12 that it was in way. } It's a clearly which he had said it's
13 clearly a gross negligence. Why would -- you did not
14 direct a verdict to the jury. Why in my case?

15 THE COURT: Who is going to have the last word? You
16 keep asking the questions and I keep answering them.
17 There's got to be some finite end. I'll answer the
18 question, but that's going to be the end of the day in
19 court. Mr. Payne was not an eye witness. He was the first
20 testimony. I heard his opinion. It was based on
21 circumstances which the jury didn't find to be.

22 In my opinion, Officer Kars did act reasonably as a
23 reasonably careful and prudent person in approaching the
24 intersection. In my opinion, he looked to the left, as
25 anyone would, and he was obliged to. And when he looked to

1 (the left the vehicles that were parked there obscured his
2 vision. His response or reaction in that context was
3 reasonable and understandable. It was not perfect because
4 he cannot see through the cars to see you coming.

5 It was unfortunate you were hurt. No one ever wants
6 to say, and certainly, I'm not saying that what happened to
7 you was a good thing or that anybody deserved it. It is an
8 accident. (It was an accident without negligence.
9 Accidents sometimes happen to people who are careful like
10 you, like the officer.

11 It was an accident and not every accident creates a
12 situation where somebody is at fault. I'm very sorry you
13 were in the accident. I'm very sorry you suffered then
14 suffered subsequently and continue to suffer. And I'm very
15 sorry you were in a subsequent accident, which reasonable
16 people could say maybe caused or aggravated your situation,
17 but I don't have to consider that because that subsequent
18 going off the road at 60 miles an hour and it's consequence
19 was not the case before us.

20 Sometimes bad things happen to good people, and
21 there is nobody that you could point a finger to or fault
22 for. And I'm saying that in this case, forget all the
23 things you didn't like about it. It was an accident. And,
24 in this case, the officer was the other part of the
25 accident was not negligent.

1 MR. JAHM: Okay, sir. Can I give you one document
2 which you can be add to that which the Court which is
3 before this accident. It's a Dr. Miller's report, which he
4 mentioned my cognitive issue before this accident. And I
5 want this Court to have this in this file.

6 THE COURT: I have that. You gave that to me.

7 MR. JAHM: No, not Mr. Miller.

8 THE COURT: I have something from the Social
9 Security office, something from Gary L. Miller, D.O. That's
10 all I'm accepting. No more papers, no more time.

11 MR. JAHM: Right.

12 THE COURT: No more forum. Have a nice day and go
13 to the Court of Appeals.

14 MR. JAHM: How many days I have now?

15 THE COURT: It's all in the book. I'm not going to
16 advise you.

17 MR. JAHM: I sign application today.

18 MR. NOLAND: Your Honor. May I indicate for the
19 record I've handed Mr. Jahm the judgment you have for the
20 record today?

21 MR. JAHM: You can mail me the copy.

22 MR. NOLAND: Please accept it today.

23 THE COURT: It's given to you in open court. That's
24 the same service. Thank you. Don't be difficult just
25 because you don't like the man. In my court, we have

1 courtesy on both sides. You've got a copy of it, now
2 you're served. That's it. Thank you very much. If you
3 have papers here, please take them with you. They may be
4 important for you. We're in recess.

5 MR. NOLAND: Thank you, your Honor.

6 (Motion ended at 10:34 AM)

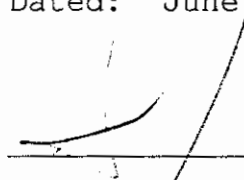
STATE OF MICHIGAN)

) ss.

COUNTY OF KENT)

I certify that this transcript, consisting of 27
pages, is a complete, true and correct transcript of the
motion proceedings held in this case on October 4, 2002.

Dated: June 10, 2003



Shawn M. Breimayer, CSR

Notary Public, Ionia County, MI

Acting in Kent County, MI

My Commission Expires: 3-20-04

Page

RIVERBEND BODY SHOP, INC.
4141 LAKE MICHIGAN DRIVE N.W.
GRAND RAPIDS, MI 49544

OFFICE: 616-453-7795 FAX: 616-453-7388
FED. I.D. # 38-2337804 FACILITY # F120494 ASA# 00780-00610
CD LOG NO 0004566 DATE 11/01/99

SHOP CONTACT: HOWERZYL, ALAN

INSP DATE 11/01/99

OWNER CITY OF WALKER
ADDRESS 4243 REMEMBRANCE
CITY STATE GRAND RAPIDS MI
ZIP 49544

HOME PHONE (616)453-6311
WORK PHONE

LIC# 253X38
BODY COLOR BLUE

VIN 2FAFP71WXWX147363
MILEAGE 26944

E=NEW PART EC=ECONOMY PART EU=SALVAGE PART
EP=SEE PX REPORT P=CHECK I=REPAIR/ALIGN/SUBLET
L=REFINISH N=ADDN'L LABOR OPERATION TE=PART/PARTIAL REPLACE
ET=LABOR/PARTIAL REPLACE IT=LABOR/PARTIAL REPAIR AA=APPEARANCE ALLOWANCE
RP=RELATED PRIOR DAMAGE UP=UNRELATED PRIOR DAMAGE *=USER ENTERED VALUE

CAR # 9

9 FORD CROWN VICTORIA 4 DOOR SEDAN P4173A/B OPTNS D/24

OPTIONS: TWO-STAGE - EXTERIOR SURFACES TWO-STAGE - INTERIOR SURFACES

OP	GDE	MC	DESCRIPTION	MFG. PART NO.	PRICE	AJ%	HOURS	R
EC	006		COVER, FRONT BUMPER	ECONOMY PART	318.50*		2.0	1
L	006	09	COVER, FRONT BUMPER	REFINISH			4.0	4
E	279		MLDG, FRONT BUMPER	F8AZ17C829AA	36.68			1
I	030		PANEL, FRONT END	REPAIR/ALIGN			2.0	*1
L	030		PANEL, FRONT END	REFINISH			2.8	4
I			SQUARE FT UNIBODY	REPAIR/ALIGN			4.0	*3*

6 ITEMS

MC MESSAGE

09 INCLUDES 0.6 HOURS MAJOR PANEL TWO-STAGE ALLOWANCE

FINAL CALCULATIONS & ENTRIES

GROSS PARTS	36.68
OTHER PARTS	318.50
PAINT MATERIAL	102.00
PARTS TOTAL	457.18
TAX ON PARTS	@ .000%

FORD CROWN VICTORIA 4 DOOR SEDAN
CD LOG NO 0004566

Page
Date 11/01/99

LABOR	RATE	REPLACE HRS	REPAIR HRS	
1-SHEET METAL	34.00	2.0	2.0	136.00
2-MECH/ELEC	48.00			
3-FRAME	45.00		4.0	180.00
4-REFINISH	34.00	6.8		231.20
5-PAINT MATERIAL	15.00			
LABOR TOTAL				547.20
TAX ON LABOR		@	.000%	
SUBLET REPAIRS				
TOWING				
STORAGE				
GROSS TOTAL				1,004.38
NET TOTAL				1,004.38

ADP SHOPLINK U1471 ES LOG 0004566 DATE 11/01/99 15:59:54 R4.2 CD 09/99
PXN:NN/00/00/00/00 CUM:00/00/00/00
Copyright, 1999 Automatic Data Processing

1.7 HOURS WERE ADDED TO THIS ESTIMATE BASED ON ADP'S TWO-STAGE REFINISH
FORMULA: 20% OF REFINISH HOURS, AFTER OVERLAP, PLUS 0.6 HOURS FOR THE FIRST
MAJOR PANEL, WHERE NOTED.

THIS IS AN ESTIMATE BASED ON OUR INSPECTION. OCCASIONALLY AFTER THE WORK HAS
STARTED WORN, BROKEN, OR DAMAGED PARTS ARE DISCOVERED. NATURALLY THIS
ESTIMATE CANNOT COVER SUCH CONTINGENCIES. PARTS AND LABOR PRICES ARE CURRENT
AND SUBJECT TO CHANGE.

3

STATE OF MICHIGAN
THE CIRCUIT COURT FOR THE COUNTY OF KENT

RASHID A. JAHM,

Plaintiff,

File No. 00-08794-NI

v

HON. DENNIS B. LEIBER

CITY OF WALKER, a Michigan Municipal
Corporation, and EUGENE E. KARS,

Defendants.

Rashid A. Jahm
In Pro Per
3009 Eastern S.E., Apt. 303E
Grand Rapids, MI 49508
(616) 559-6185

Craig R. Noland (P30717)
SMITH, HAUGHEY, RICE & ROEGGE
Attorneys for Defendants
200 Calder Plaza Bldg.
250 Monroe N.W.
Grand Rapids, MI 49503-2251
(616) 774-8000

**JUDGMENT AWARDING CASE EVALUATION SANCTIONS
IN FAVOR OF DEFENDANTS AGAINST PLAINTIFF**

Defendants filed a Motion requesting the Court to award case evaluation sanctions pursuant to MCR 2.625 and 2.403(O). In consideration of the Motion, the pleadings, and responses to the Case Evaluation;

IT IS HEREBY ORDERED AND ADJUDGED that defendants' Motion be granted and that Judgment be entered in favor of defendants against plaintiff, Rashid A. Jahm, in the amount of \$74,422.53.

IT IS SO ORDERED.

DENNIS B. LEIBER

Hon. Dennis B. Leiber, Circuit Judge

Attest: A True Copy

DB

SMITH, HAUGHEY, RICE & ROEGGE, A Professional Corporation

STATE OF MICHIGAN
ATTORNEY GRIEVANCE COMMISSION

Dear Sir,

I am Rashid Jahm Filing complaint against attorney Craig Noland for his plotting a conspiracy using his personal resources by altering, tampering picture of the scene of accident and altering document which was occur with police car on Oct. 31.1999 while he was representing defendant city of walker.

I request to investigate the pictures that he presents to court during trial.

Offering boat rides to insurance agent who was at the mediation conference meeting in front of the police chief of walker police.

Receiving \$ 75000 for the case from the insurance company. Which is lot. Not including other expenses, which will be investigated.

Misconduct of professional duty to legal system and to public and to both parties.

His Violation of code of ethics that he owes to society.

I request to Board to ask to provide pictures of the scene and the police report and why he brought police chief with uniform every day sit next to him in the trial during witness hearing. Why he is not permitting his professional insurance (Great American) to disclose his policy coverage what kind of coverage he has.

Respectfully

DT: - 10-15-03

Rashid Jahm
49 Hallenan ave
Lawrence, Ma. 01841
978-2548-9419

STATE OF MICHIGAN
ATTORNEY GRIEVANCE COMMISSIONMARQUETTE BUILDING
243 W. CONGRESS, SUITE 256
DETROIT, MICHIGAN 48226-3259

5

REQUEST FOR INVESTIGATION OF ATTORNEY:

Craig Noland (P30717) Attorney
 (Name of Attorney)
200 Calder Plaza Building
 (Street and Number)
250 Monroe, NW
 (City and State) (Zip Code)
Grand Rapids, MI. 49503-2251
 (Area Code) (Telephone Number)
616 - 774-8000

Date attorney was hired/appointed? _____

Type of case: (divorce, criminal, probate, etc.) civilHave you previously complained to our office about this attorney? No When? _____

STATEMENT OF FACTS

(Please be specific. You may attach additional pages if necessary.)

Mr. Craig Noland was dependent in the case in the court of Judge Dennis Leiber. where Mr. Craig conspire with other by violating code of Ethic which he owed to his professional and to legal system. Alter, Tampering, conspiracy, fraud, Misleading downgrading to other, falsifying statement for his own financial gain, taking law in his hand to cross others boundaries. I have all the document prove it. Thank you for your cooperation Sincerely

I request an investigation by the Attorney Grievance Commission. Rashid J.

Date: 10-15-03

You must provide two (2) completed
 copies of this form and two (2)
 copies of all attachments. We cannot
 process unsigned complaints.

(Signature)

(Name - type or print)

(Street and Number)

(City and State)

RASHID A JAHM

49 Hallenar Ave

Lawrence, MA - 01841-

(Zip Code)

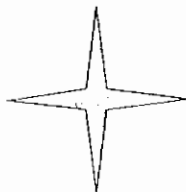
(Telephone Number)

Mr. ☒Mrs. ☐Ms. ☐

978-258-9419

Magnetic North Consulting Services, Inc.

1345 MONROE NW
 GRAND RAPIDS, MICHIGAN 49505
 616.356.8628 or 616.356.8556
 FAX 616.356.8657



GARY McDONALD, PRESIDENT
 ACCIDENT RECONSTRUCTION
 CONSULTANT

September 5, 2002

Craig R. Noland
 SMITH, HAUGHEY, RICE & ROEGGE
 200 Calder Plaza Building
 250 Monroe Avenue NW
 Grand Rapids, MI 49503-2251

INVOICE NO.: 49-01B4

Re: Rashid Jahm v City of Walker and Eugene E. Kars

Dear Mr. Noland:

I have completed my billing to date reference the above matter. If you have any questions, please contact me.

09/03/02	Perpetration for testimony in Kent County Circuit Court.	2.5 hrs	\$ 337.50
09/04/02	Meeting with Attorney Noland.	3 hrs	450.00
09/05/02	Appearance in Kent County Circuit Court.	4 hrs	600.00
	Administrative Aid:		\$ <u>40.00</u>

TOTAL DUE: \$1,427.50

Federal ID #
 38-3094655

Respectfully,

Gary J. McDonald

Gary J. McDonald

GJM/sb
 49-01b4.wpd

SMITH HAUGHEY RICE & ROEGGE

A Professional Corporation
ATTORNEYS AT LAW

200 Calder Plaza Building
250 Monroe Avenue, N.W.
Grand Rapids, Michigan 49503-2251
Telephone 616-774-8000
Fax 616-774-2461

1400 Abbott Road, Ste. 410
East Lansing, Michigan 48823-1962

202 E. State Street, Ste. 100
Traverse City, Michigan 49684

320 N. Main Street, Ste. 101
Ann Arbor, Michigan 48104-1127

<http://www.shrr.com>

Robert M. Kruse
Jeffrey R. Wonnacott
Aileen M. Leisgrandt
David J. DeGraw
Robert W. Parker
Paul T. Jarboe
Jeffrey B. Gwillim
Randall L. Veizer
John R. Oostema
Matthew L. Meyer
Martha P. Fennan
Todd W. Miller
Veronica A. Wasmich
Karl W. Butters, Jr.
Carroll J. TenHave-Chapman
J. Joseph Rossi
Peter J. Boyles
Thomas R. TerMaat
William A. Sikkeli, IV
Rachel Brochert Rue
Jo Beth Earl

Laurence D. Smith
1913-1980

Angela T. Ross
Eric W. Phelps
Kevin M. Lespenance
Brian A. Natikougham
Heather K. Blinston-Dyle
Jeffrey J. Noorman
William L. Honn
Kirk W. Morgan
Carrie J. Soder
Mark A. Gilchrist

Also licensed in:
1 Colorado
2 District of Columbia
3 Florida
4 Illinois
5 Indiana
6 Pennsylvania
7 Wisconsin
8 Georgia

Michael S. Darnes
1944-1989

L. Roland Roegge
Thomas F. Blackwell
P. Laurence Mulvihill
Thomas R. Baker
Paul H. Reinhardt
Lance E. Mathias
Charles F. Bohler
Gary A. Rowe
Edward P. Stein
William W. Jack, Jr.
William J. Housharp
Thomas M. Weibel
James G. Black
B. Thomas McCarthy, Jr.
Gleason W. House, Jr.
Craig R. Noland
Paul M. Olaniczak
Craig S. Neckow
George F. Baerup
John C. O'Loughlin
Anthony J. Quarto
A. B. Smith, Jr.
David O. Haughey
Lawrence P. Mulligan
Albert T. Quick
Brenda Jones Quick
Of Counsel

John M. Kraus
Paul Van Oostenburg
Mark P. Buskel
Dale Ann Iverson
William R. Jewell
Jon D. Vander Elving
Patrick F. Geary
R. Jay Hardin
Terence J. Ackert
Brian J. Kilbaur
Charles B. Juleon
Robert C. Stone
Robert W. Tibbbs
Douglas G. Puwe
Richard C. Kraus
Albert J. Engel, III
Phillip K. Mewers
Carol D. Cadson
Marilyn S. Nickel Tyree
Christopher R. Gentner
Beth S. Kramer

Robert V. V. Rice
1899-1982

April 16, 2002

Charles VanDyken, DDS, MS
2020 Raybrook Street, S.E.
Grand Rapids, MI 49546

RE: Rashid A. Jahm
DOB: 06/25/51
SSN: 106-66-0721
Our File No: 70483

Dear Dr. VanDyken:

Enclosed is an executed Medical Authorization requesting any records you may have concerning Mr. Jahm with respect to any illness or injury, including medical, hospital or clinical records and reports and radiology films. Please note that we are requesting a copy of your actual office records, as opposed to a narrative report. Additionally, we ask that you forward to the undersigned a copy of your records and films regarding Mr. Jahm within the next two weeks. We will, of course, reimburse you for reasonable photocopying expenses. Should the fees exceed \$100.00, please contact me prior to copying the records.

Should you have any questions regarding our request and/or the enclosed authorization form, please do not hesitate to contact the undersigned. My direct dial telephone number in Grand Rapids is 616/458-9463.

look for 2nd

Sub-4-29-02
w/ x-rays